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AGREEMENT

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MONTANA/ENVIRONMENTAL PROTECTION AGENCY

AGREEMENT

Agreement on the Management and Administration of Montana's Environmental Programs for Federal Fiscal Year 1982

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HELENA, MONTANA 5962

September 1981

Approved:

The undersigned hereby execute this Agreement on the Management and Administration of Montana's Fiscal Year 1982 Water Pollution Control, Safe Drinking Water, Air Quality, Solid Waste Management, Radiation and Pesticides Programs.

State of Montana

Ted Schwinden
Governor
State of Montana

Sept 22 1981
Date

John J. Drynan by D. S. Williams
John J. Drynan, M.D., Director
Department of Health and
Environmental Sciences

Sept. 22, 1981
Date

W. Gordon McOmber, Director
Department of Agriculture

Date

Environmental Protection Agency

Steven L. Durham
Regional Administrator

9/22/81
Date

Max H. Dodson, Director
Montana Office

9/22/81
Date

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INTRODUCTION

Governor Ted Schwinden, in a speech to the Montana Wildlife Federation June 13, 1981, said:

> For too long advocates of environmental protection and proponents of resource development have been engaged in a philosophical tug-of-war over which attitude should prevail...Instead of endless arguments we need cooperation. Because both environmental protection and resource development are vital to our existence, we must determine how best both can be accomplished in this state.

The spirit of cooperation between environmental protection and resource development also applies to government agencies. The Departments of Health and Environmental Sciences (DHES) and Agriculture (DOA) are among the state agencies charged with protecting Montana's natural resources. As the federal counterpart to the DHES and DOA, the U.S. Environmental Protection Agency (EPA) is charged with a Congressional mandate to administer various environmental programs. Collectively, the three agencies work to cooperate among themselves and with the public.

Through grants, research, monitoring, technical expertise and other areas of cooperation, DHES, DOA and the EPA have taken lead roles in helping Montanans improve their quality of life.

The workload created by these diverse programs prompted EPA to inaugurate a novel approach to planning and management. The approach involves a comprehensive Montana/EPA Agreement (MEA), the aim of which is to consolidate all applications and narratives into one document. The result has been a reduction in paperwork and duplication of effort, and more efficient program management.

There has been little format change in the state programs addressed in the 1982 MEA, the programs include DOA's pesticide program and the DHES's air, water, radiation and solid waste management programs.

The elements of the MEA include: (1) an overview of the state's environment; (2) identification of objectives; (3) strategies to accomplish priorities, and (4) detailed work plans consisting of narrative descriptions of activities and resource commitments.

STATE ENVIRONMENTAL OVERVIEW

Clearly, the major objectives in environmental programs are to control pollution and to protect public health and the environment. Both state and national legislation contain many references to these objectives.

The references include:

Montana Pesticides Act:

> The purpose of the statute is the control of pesticides for the protection of man and his environment, including water, air, food, animals, vegetation, pollinating insects and shelter.

Clean Air Act of Montana:

> ...to achieve and maintain such air quality as will protect human health and safety, and, to the greatest degree practicable, prevent injury to plant, animals, and property...

Federal Clean Water Act:

> It is the policy of the Congress to recognize, preserve, and protect the primary responsibilities and rights of states to prevent, reduce, and eliminate pollution, to plan the development and use (including restoration, preservation,and enhancement) of land and water resources...

Montana Solid Waste Management Act:

> ...control of solid waste management systems is intended "to conserve natural resources whenever possible" as well as to protect the public health and safety.

Determining the methods and approach to meeting these objectives is the business of federal, state and local environmental agencies. These organizations are in turn responsible for ensuring that all concerned parties are given the opportunity to participate in the decision-making process.

Decentralization

There has been a gradual shift from the centralized form of environmental decision making and management to a more responsive decentralized organization. The federal executive branch and Congress have been expanding the philosophy that decentralization can produce better results. Federal grants that enable states to assume the authority for programs allow for the implementation of that philosophy.

An important aspect of decentralization is delegation of authority. Considerable progress has been made in delegating major program authorities from the EPA to the states, with Montana agressively pursuing the delegation of most federal environmental programs. From a legislative perspective, the state has all the required authorities in the MEA with the exception of Underground Injection Control. Due to the time required to develop regulations

and financial considerations, the complete delegation of authority for all programs continues to be a phased process. The delegation of Phase I for the interim authorization of the Hazardous Waste Program to Montana was a major accomplishment in FY 1981.

The final delegation of the Municipal Wastewater Facility Construction Grants Program under Section 205 (g) of the Clean Water Act was an additional major effort during FY 1981. The implementation of the formal delegation agreement was completed on April 1,1981. Development of EPA's program evaluation responsibilities will be the major initiative for FY 1982.

Three additional program areas will receive attention during FY 1982.

1. Hazardous Waste Management

   The state has achieved initial authorization for the Hazardous Waste Program effective February 26, 1981. By October 1981 EPA regulations for most of Phase II should be promulgated and the state could submit an application for assumption of appropriate portions of Phase II.

2. Prevention of Significant Deterioration (PSD)

   The state will have adopted regulations to assume this program by the end of January 1982. EPA intends on delegating the program by July 1982.

3. Operating Agreement

   To further focus on the delegation of programs, a revision to the EPA operating agreement for the Montana Office will be renegotiated with the Governor's Office by January 1982. This revision will analyze the current status of delegations and will identify other program areas that can and should be delegated. Additional emphasis will be put in the identification of the respective roles for state environmental agencies, the EPA's Montana Office and the EPA Regional Office in Denver. The objectives of this analysis will be to remove duplication of day-to-day efforts and to develop a more effective state/federal team approach to solving environmental health problems.

Delegation in all cases does not relieve EPA of the responsibility for ensuring that national goals, objectives and requirements are met. In some instances the federal laws or regulations require that the EPA retain concurrent authority with Montana. This partnership is mutually beneficial to Montana and EPA when carried out in an atmosphere of trust, cooperation and respect. Such a partnership in

related program evaluation functions are not to be used to second-guess or limit the flexibility and management prerogatives of the states where programs are achieving environmental objectives. EPA's role in day-to-day activities will continue to decrease in FY 1982 and will become one of support, program review and evaluation.

Public Health

The common denominators in most environmental programs are public health and protection of the environment. Ever increasing amounts of harmful substances are being identified. The impact of these substances on the health of the public continues to be a concern. The reduction of public exposure to dangerous pollutants continues to be a high priority. Several studies have been initiated by the state addressing public health issues. The statewide Montana Air Pollution Study (MAPS), the Butte Radiation Study and the Pesticides Drift Study in the Kalispell area are a few of the noteworthy efforts. For FY 1982, the state and EPA will again concentrate on identifying, evaluating and controlling pollutants that endanger public health.

Prevention

As a state, Montana has built a reputation for its commitment to preserving the quality of its land, water and air. When reviewing the state of Montana's environment, it becomes apparent that the state does not suffer from widespread and serious environmental degradation; a testimony to the effectiveness of the state and its citizens in carrying out their commitment. Stationary air sources, point sources from water and solid waste/hazardous material disposal problems are known, and solutions are being proposed. The state and EPA cannot, however, take the position that threats to Montana's environmental integrity are under control. The prevention aspect of the environmental programs is particulary important to Montana. As an example, the production and export of energy has been steadily increasing (Figure #1). With energy development comes accompanying enviromental impacts that require regulation. For the future, Montana, like every state that feels the pressure of conflict between natural and human needs, will have to guard against unplanned and unexpected threats to its environmental integrity. Therefore, an additional major objective of the state and EPA will be the vigorous enforcement of existing environmental legislation with an emphasis on new sources.

Energy Development

The apparent national rush to discover, extract and exploit new energy resources could prove to be economically, socially and environmentally devastating. As our nation continues to develop and revise policies and programs directed to alleviate the energy crisis, Montana and its energy rich neighbors are being looked to for the bulk of the increase in domestic energy production.

The energy resources potential of Montana alone is immense. Coal reserves are measured in billions of tons. Potential oil and natural gas reserves are counted in billions of barrels and trillions of cubic feet. Hydropower on our river systems produces thousands of megawatts.

As the debate continues over which energy sources -- oil, natural gas, coal, solar, geothermal, hydro, nuclear, wind or some exotic type -- will solve our country's problems, one possibility appears almost certain: Montana, with its abundant resources, will play a major role in achieving the national goal of energy independence.

This assumption is gaining credibility by:

--Department of Energy's synthetic fuel program proposals and coal production targets,

--Department of Interior's leasing program,

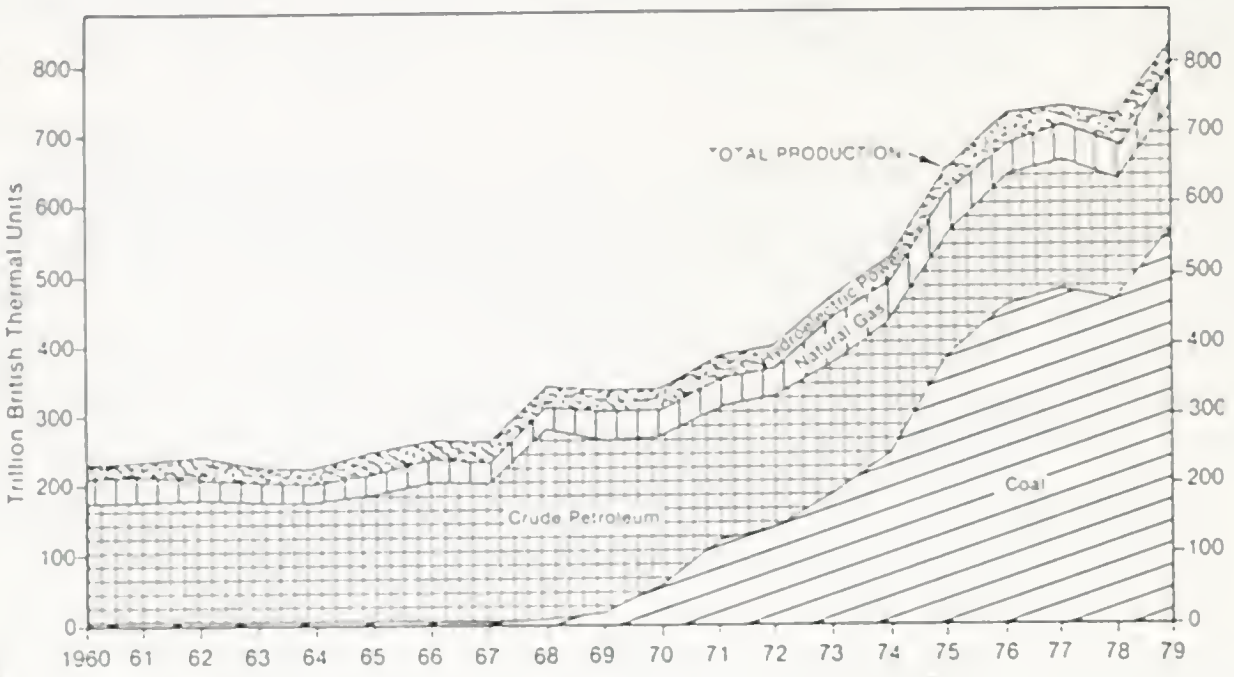
--coal consuming states recent attacks on Montana's coal severance tax,

--wilderness controversies and

--by various other legislative and judicial attempts aimed at simplifying and expediting extraction and utilization of Montana's abundant energy related resources.

Montana has helped, and will continue to help, meet our nation's energy needs. But water flowing through turbines to generate electricity, coal produced steam to drive huge generators and the conversion of coal to synthetic natural gas or liquid cannot be accomplished without some inescapable and often unmitigatable environmental, social and economic costs. Montanans demand and expect to have a major role in determining those costs.

The state and EPA are committed to working together to develop consistent policies and applying mitigative measures to utilize Montana's resources without foregoing the amenities of clean air, pure water and productive lands. Without federal, state and local involvement and coordination, energy development in Montana could proceed with a rapidity and concentration that could overwhelm the ability of citizens and government agencies to adequately respond,control and mitigate the adverse impacts associated with increased energy development.



Source: Department of Natural Resources and Conservation, Energy Division, *Montana Historical Energy Statistics* 4th edition 1980

Figure 1. Production of Energy in Montana By Type of Fuel

Program Environmental Summaries

The environmental problems in the state of Montana are as diverse as its geography. For this reason the precise definition of problems is an evolutionary process. As more resources and expertise become available, the more thorough problem definition becomes.

Presently most physical and chemical surface water quality conditions are generally known throughout the state. Comprehensive biological monitoring is underway, with statewide coverage scheduled for completion by 1982. Lake classification work under an EPA Section 314 Grant is also underway, with completion scheduled for 1981. Fisheries classification work has been recently completed by the Department of Fish, Wildlife and Parks (DFWP). The inventorying of

drinking water supplies has been a continuing effort, with the majority of supplies investigated during 1978-79.

In Montana, as throughout the United States, a major emphasis is being placed upon the proper management of hazardous wastes. During fiscal year 1982, a comprehensive investigation will be undertaken to determine the extent of the hazardous waste problem and to establish the mechanism to properly deal with that problem. Through the next fiscal year, the extent of the solid waste problems will continue to be evaluated through such means as the open dump inventory.

Air quality problems related to sulfur dioxide (SO2) have been defined for East Helena and will be for Billings during FY 1982.

Total suspended particulate (TSP) problems have been located. Butte and Missoula will require development and implementation of control strategies for TSP. East Helena and Billings will continue to implement TSP control strategies in FY 1982.

Carbon monoxide (CO) problems exist in at least three major cities (Billings, Great Falls and Missoula). In order to determine the extent of the CO problem, additional data must be collected and modeling performed in Missoula and Great Falls.

More information needs to be collected to establish the extent of the lead problem. New source air quality impacts related to energy production and mining are unknown and will require extensive monitoring and evaluation to prevent significant deterioration.

Groundwater data have historically been limited. The major initiative for FY 1982 will be EPA's inventorying of underground injection control techniques and groundwater resources, and the state's implementation of its proposed groundwater regulations.

Human exposure to elevated levels of natural radioactivity has been defined, particularly in mineralized areas of western Montana. Studies to determine the extent, magnitude and sources of these exposures are underway.

Summaries of available data by program area follow:

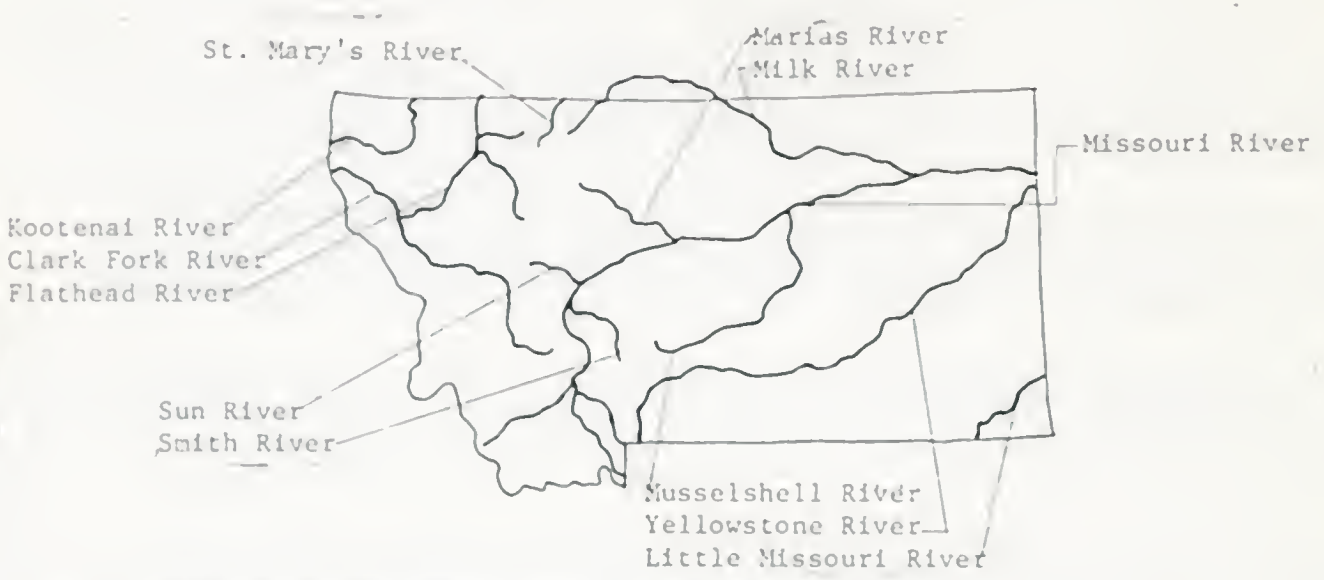
Water Quality

From parched plains to snow-capped peaks, there is no typical Montana water. The warm, sometimes salty and silt-laden prairie stream is as much a feature of Montana's natural resource inventory as the crystalline and icy mountain cascade. Superimposed over this broad spectrum of water quality are the activites and effluents of a largely rural Twentieth Century American society.

Historically, the state's efforts to curb pollution have centered on end-of-the-pipe or process control. Great strides have been made in the cleanup of municipal and industrial discharges in recent years.

Much of this progress is attributable to a fair but enforceable set of water quality standards, permits issued under the Montana Pollutant Discharge Elimination System (MPDES), the federally-subsidized Construction Grants Program for wastewater treatment plants and an improving atmosphere of cooperation between water users and regulatory agencies to reduce degradation. Less than 10 percent of the stream miles degraded by point sources in 1960 are degraded today. Virtually all of the remaining point-source water quality problems in Montana have been identified and plans are being made for their eventual elimination.

Figure 2. Major Streams and Basins



Our knowledge of non-point-source pollution, embryonic before passage of the 1972 Federal Water Pollution Control Act Amendments, is finally coming of age. With the wholesale shift in program emphasis identified in Section 208 and the accompanying injection of federal funds, knowledge of non-point pollution in Montana is now on a par with knowledge of point-source pollution. Thanks to a battery of water quality assessments performed by scores of conservation districts, areawide organizations, Indian tribes and state and federal agencies, the massive non-point pollution picture is at last coming into focus.

In a recent distillation of this compendium of 208 literature and monitoring data, the Water Quality Bureau (WQB) and the Montana EPA office identified 34 stream segments and lakes throughout the state as having significant water quality problems. Only two of these significant problems--Hot Springs Creek and the East Gallatin River--have as their primary cause a permitted discharge and both are at some stage of improvement. The sources of pollution contributing to the 34 problem areas have been categorized as follows: Municipal

wastewater discharges - 9; agriculture - 22; mining - 9; hydrologic modifications - 11; on-site disposal - 5, and other - 8. These figures illustrate the common problem of having to deal with multiple, combined impacts when assessing problems and developing controls associated with nonpoint source pollution. Plans for mitigating a large number of these problems have already been drafted and implementation efforts have begun on a few. There are in addition, many lesser, more local problems stemming from logging and road building as well as farming, ranching, mining and other resource extractive activities. For every stream mile degraded by sewage or industrial effluents in Montana today, there are 40 miles or more degraded as a consequence of land use and water management practices.

Montana's "Big Three" water quality problems are dewatering, sediment and salinity. Soil and water conservation districts have identified 873 miles of dewatered streams in Montana. The infamous Muddy Creek of the Sun River is Montana's showcase sediment problem, but there are scores of others. Saline seep and its effects are common knowledge among water professionals in the state and, like erosion and sediment, they need no further elaboration.

Non-point source water quality problems often transcend political and property boundaries. They are, moreover, often compounded by resource mismanagement in two or more categorical areas. For example, Prickly Pear Creek near Helena, one of Montana's five poorest quality streams, passes through two counties, two conservation districts, several towns and subdivisions, holdings of the U.S. Forest Service and the Bureau of Land Management, and numerous private properties, both individual and corporate. Its problems stem from mining and mineral processing, from urban runoff and municipal wastewater discharges and from livestock overuse and excess water diversion for irrigation. Problems of such complexity require cooperation and a united effort for their solution.

Two ambient water quality monitoring programs have been established to provide timely and objective information on water quality conditions and trends statewide. The traditional chemical/physical parameter monitoring network, consisting of approximately 140 stations, is maintained largely by the U.S. Geological Survey (USGS) and has been in operation for many years. Most sites and parameters are monitored on a monthly basis. The WQB's new Biological Monitoring Program began in 1977 by establishing baseline conditions of algae and invertebrate communities at 85 sites on 59 streams across the state. Beginning in 1980 and every even-numbered year thereafter, any changes in these biological monitors will be measured and noted.

Intensive surveys are scheduled periodically in order to clarify a water quality problem, to assess implementation success and to provide information for permit reviews, construction or program planning.

Although municipal and industrial discharges do degrade water quality, the WQB has identified and does require permits for all

discharges. Major industrial discharges are monitored or inspected at least twice each fiscal year; major municipal discharges are monitored or inspected at least once each year.

Drinking Water

The initial Montana law relating to public water supplies was originally enacted in 1907. This law was revised in 1977 and again in 1979 to enable Montana to receive and retain delegation for administration of the "Federal Safe Drinking Water Act " (PL 93-523) enacted in 1974. Montana's program covered about 250 community water systems prior to 1978. The present program regulates all systems which have at least 10 service connections or serve 25 individuals daily for at least 60 days a year.

The public water supply (PWS) inventory varies, but usually includes about 600 community water systems and 1,200 non-community water systems.

From a quality standpoint, the state's drinking water is considered generally good in western Montana. Those supplies in eastern Montana, particularly groundwater, would be considered poor. The exceptions in western Montana are those waters high in turbidity. In the eastern part of the state, the communities using surface supplies, with few execptions, have water treatment facilities capable of providing quality water. However, the groundwater supplies are generally high in total dissolved solids. Some of the smaller supplies have fluorides and nitrates which exceed the maximum contaminant level (MCL). The following information identifies, on a statewide basis, the fluoride, nitrate, arsenic, selenium and turbidity problems in the state. Some of these systems are planning improvements to their systems which will enable them to meet the M.C.L.

All of Montana's surface water systems are now monitoring for turbidity with the exception of St. Ignatius which is in the process of switching to a groundwater system.

Nearly all of the community public water supplies are now monitoring for bacteriological quality on a regular basis. The maximum contaminate level for coliform bacteria is rarely exceeded. Of 610 community supplies, only about 10 do not monitor on a routine basis.

The inventory of noncommunity public water supplies has been completed and about 60 percent of these supplies have begun taking bacteriological samples on a quarterly basis.

A program for radiological monitoring has been developed and will be implemented during the next 1-2 years. This program will include all community supplies.

Community Public Water Supplies Which Exceed MCL's:

Supply	Constituent	Reported Level (mg/l)	Maximum Contaminant Level(MCL)
Ashland	Fluoride	3.9	2.4
Circle		5.2	
Lambert		4.1	
Richey		4.4	
Highland Park, Glendive		3.8	
Spring Grove Tr. Ct., Glendive		3.1	
Cheeks Tr. Ct., Glendive		3.8	
Alta Tr. Ct., Miles City		2.57	
Bills Trailer Villa, Miles City		2.74	
Greenstar Mobile Home Village, Miles City		2.96	
Thiel Valley Water, Sidney			
Wagon Wheele Tr. Ct., Forsyth		2.58	
W & R Mobile Home Village, Fairview		5.23	
Wagon Wheel Tr. Ct., Forsyth		5.5	
Flaxville	Nitrate	34.0	10.0 as NO3-N
Rapelje		13.0	
Coffee Creek		14.0	
Denton		13.0	
Turner Colony, Turner		35.5	
Three Forks	Arsenic	0.06	0.05
Rapelje	Selenium	0.036	0.01

Community Public Water Supplies which utilize surface water and have exceeded the maximum contaminant level of 1.0 N.T.U. (Nephelometric Turbidity Units) for a monthly average.

Bozeman
Tiber County Water District, Conrad
Helena (Ten Mile System)
Neihart
Ronan
White Sulphur Springs
East Glacier
Hill County Water District, Hingham
Power
Sheridan
Troy

Construction Grants

A federal grant program was initiated in 1956 to assist municipalities in the construction of sewage treatment facilities. The state has assisted the EPA and predecessor agencies in administration of this program by establishing needs and priorities, and reviewing project applications and preliminary and final plans. Federal grants on projects have increased from 30 percent to 75 percent (85 percent where the project uses innovative or alternative treatment mechanisms such as land disposal) of eligible project costs.

Using the priority system developed by the WQB and approved by EPA, a priority list is drawn up at least once a year. Grant monies are then set aside for the top communities on the list.

The grant process is presently divided into three steps. Step 1, called facilities planning or Section 201 planning, is a detailed planning effort aimed at providing a recommended solution to a community's particular sewer and treatment problems. Included in this plan is: an analysis of the existing sewer system and treatment facility; a probe of the town's anticipated development and growth trends; a comparison of the economics and effectiveness of all treatment alternatives, and an environmental assessment of the solutions. Finally, the most cost-effective, environmentally sound and socially acceptable alternative is selected.

If the plan is approved by the reviewing governmental agencies, and after local public participation and a hearing, a grant may be awarded to provide for Step 2 expenses.

Step 2 deals with the design and preparation of plans for the selected sewage disposal facilities. Following governmental approval of plans and specifications, a grant may be made to provide for Step 3 expenses. The majority of the project costs are associated with this step--construction. For some projects, one grant may be given that combines Steps 2 and 3.

Numerous delays have been encountered in the construction grant program since passage of PL 92-500 (Water Pollution Control Act Amendments of 1972). This act, in addition to providing greater federal funding, also required the EPA to develop new regulations. PL 95-217 (Clean Water Act of 1977) and PL 96-483 (Clean Water Act Amendments 1980) again authorized additional monies and changed the requirements. The facility planning program must now go into much greater detail on alternatives, particularly land disposal options. It has taken consultants time to adjust to the new planning requirements. To help expedite and provide for a more detailed review, the WQB has applied for and received from EPA greater authority over program administration as cited by Section 205 (g) of PL 95-217. As of April 1, 1981, the DHES has substantial delegation of the construction grants program.

The agreement identified specific activities to be performed by the state and EPA. Over a five-year period approximately 100 Step I, 150 Step II and 150 Step III grants must be awarded in order to utilize available funds for needy projects. This is an average of 20 Step I, 30 Step II and 30 Step III grants each year.

Wastewater Discharge Permit Program

Montana's wastewater discharge permit program began in 1968. With passage of PL 92-500 (Water Pollution Control Amendments of 1972), a federal wastewater discharge permit program was also initiated. In 1974 Montana applied for and received authority from EPA to administer this program, thus minimizing duplication of effort. EPA established wastewater discharge limitations for the various categories. Where these limitations do not allow the meeting of water quality standards (including nondegradation of high quality waters by new discharges or existing industries), stricter limitations are imposed.

Tables #1 and #2 list the various categories of major and minor industrial wastewater discharges and their present status with regard to compliance and enforcement. Most of the projects shown as inactive have eliminated their discharges to surface waters and therefore, do not need a wastewater discharge permit.

Table #3 lists the status of the municipal discharges. Montana's five largest cities (Billings, Great Falls, Butte, Missoula and Helena) all have treatment facilities capable of meeting effluent limitations except for chlorine residual and fecal coliform bacteria. There are discharge limitations on chlorine residual because of its toxic effect on aquatic life, and meeting these limitations sometimes does not allow the municipality to meet the fecal coliform limits. Billings is presently experimenting with chlorination at the secondary clarifiers which may give acceptable results. Some coliform limits may be revised based on receiving stream flows and will still meet water quality standards.

Many of the communities meeting discharge limitations still have treatment facility needs. For example, Helena, Kalispell and Missoula all need improvements to their sludge disposal systems. Helena and Kalispell have serious odor problems due to present sludge disposal practices, but are implementing land injection as an interim solution. The discharge standards for sewage lagoons were relaxed by EPA and, hopefully, this will allow many of the smaller communities to meet effluent limitations with a minimum amount of improvements.

It should be noted that essentially all dischargers (including those not in compliance) have constructed substantial treatment facilities during the last 25 years. The large percentage of noncompliance of major industrial dischargers versus the low percentage of minor dischargers is partially due to their more complex treatment facilities and greater bureau review on those that have the potential to do the most serious stream damage.

Table 1. Status of Major Industrial Wastewater Discharge Permittees

Category	Total No.	Active	Inactive	Substantially In Compliance	Not In Compliance	
Major						
Coal Mines	2	2	0	2	0	
Smelter	3	3	0	1	2	(note 1)
Plywood Mills	1	1	0	1	0	
Oil Refineries	4	4	0	2	2	(note 2)
Paper Mills	1	1	0	1	0	
Generating Plants	2	2	0	2	0	
Ore Mining	3	3	0	3	0	
Totals	16	16	0	12	4	

1. Anaconda-Warm Springs - Smelter now closed. Discharge from housekeeping and other minor industrial activity is significantly less than before shutdown and is not expected to cause water quality standard or modified permit violations. Anaconda-Butte - A compliance schedule for corrective action.

2. Exxon - Operating on compliance schedule. Farmers Union - Complaint filed, resolution pending.

Table 2. Status of Minor Industrial Wastewater Permittees

	Active	In Compliance	Not in Compliance	Notes
Fish Farms	15	15	0	
Irrigators	0	0	0	Considered nonpoint sources under Federal legislation.
Feed Lots	88	88	0	See note 1 below.
Oil Wells	10	10	0	
Mines	91	91	0	
Smelters	1	1	0	
Dairies	0	0	0	
Railroads	6	5	1	See note 2 below.
Lumber & Plywood Mills	1	1	0	
Oil Refineries	1	1	0	
Highway Projects	12	12	0	
Sand & Gravel	5	5	0	
Slaughter Plants	1	1	0	
Cement Plants	2	2	0	
Chemical Plants	1	1	0	
Generating Plants	1	1	0	
Industrial Sewage Treatment Plants	8	8	0	Mt. Power Dam Plants.
Sugar Refining	2	2	0	
Miscellaneous	12	12	0	
Totals	257	256	1	

1. Includes 41 smaller feed lots active on state permit program, but not included as part of federal permit program.

2. Compliance order issued to BN Whitefish for recent permit violations.

Table 3. Status of Municipal and Federal Wastewater Discharges

	Substantially In Compliance		Not in Compliance With Secondary Treatment Standards	
Sewage Treatment Facilities	Major	Minor	Major	Minor
Municipal & State	13	80	13	45
Federal & Indian	-	30	1	4
Totals	13	110*	14	49
Water Treatment Facilities/Waste-water Disposal				
Municipal	-	10	-	4
Federal & Indian	-	1	-	0
Totals		11*		4

*About 1/2 of these have no surface water discharges.

Looking to the issuance of new permits, the WQB expects many applications from new mining operations, most of which will be for discharging into high quality waters. There appears to be a rise in the number of applications in the beneficial use subcategory for discharge of water from oil producing wells. There will also be applications from saline seep areas for discharge of saline waters. It is highly unlikely that many of these saline discharges will be allowed, due to their potential impact on surface waters. There will also be several permit applications for highway contractors to pump water from forms used in bridge pier construction. Applications are expected from new energy developments such as power plants, synfuel plants, pipelines and alternative energy sources as well.

The WQB's major jobs in the permit area will be assuring that permittees are complying with existing permits, and to get the new applications processed. As an aid in processing large numbers of applications in such categories as bridge cofferdams, suction dredge mining, placer mining and feed lots, the WQB is attempting to develop general permits in these areas.

Air Quality

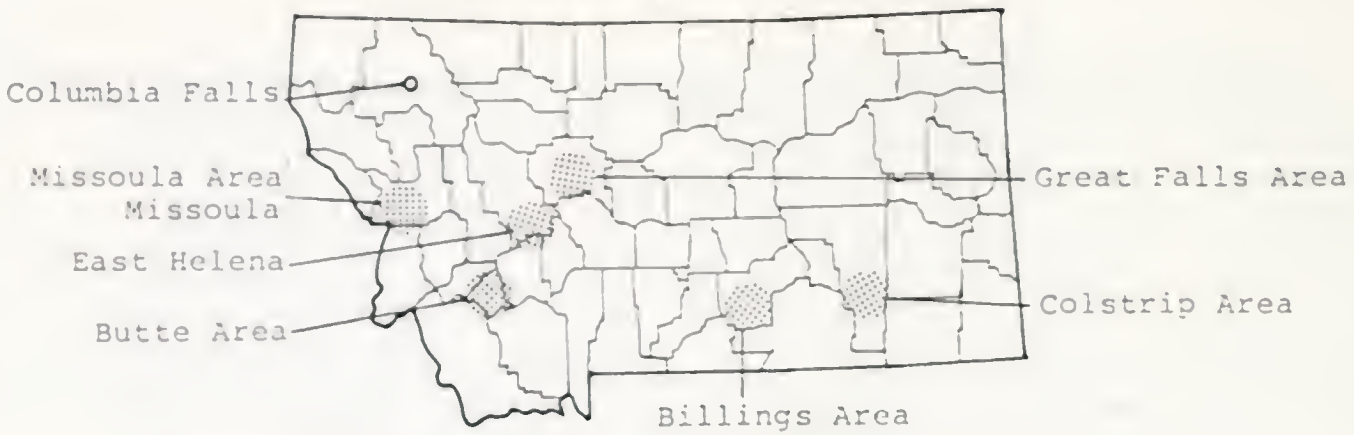
The Big Sky Country is truly what its name implies, yet there are places where the quality of air is a fragile resource. The plains east of the Rocky Mountains provide few obstructions to the sea of air that flows across the land, but in western, southern and central Montana, where various mountain ranges form valleys, air sometimes is trapped in layered inversions, causing degradation.

In addition to inversions and natural sources of contamination, man also plays a part in altering air quality. In urban areas throughout the state, such things as street dust, smoke from fireplaces and industrial emissions contribute to lowering air quality and visibility. In rural areas the largest contributors to air quality degradation are unpaved roads and mining operations.

An assessment by the Air Quality Bureau (AQB) of air quality throughout the state revealed the following information:

(Only the towns and areas mentioned do not meet primary or secondary air quality standards, the rest of the state presently meets the standards. Additionally, the entire state meets the standards for photochemical oxidants and nitrogen oxides.)

TOTAL SUSPENDED PARTICULATE



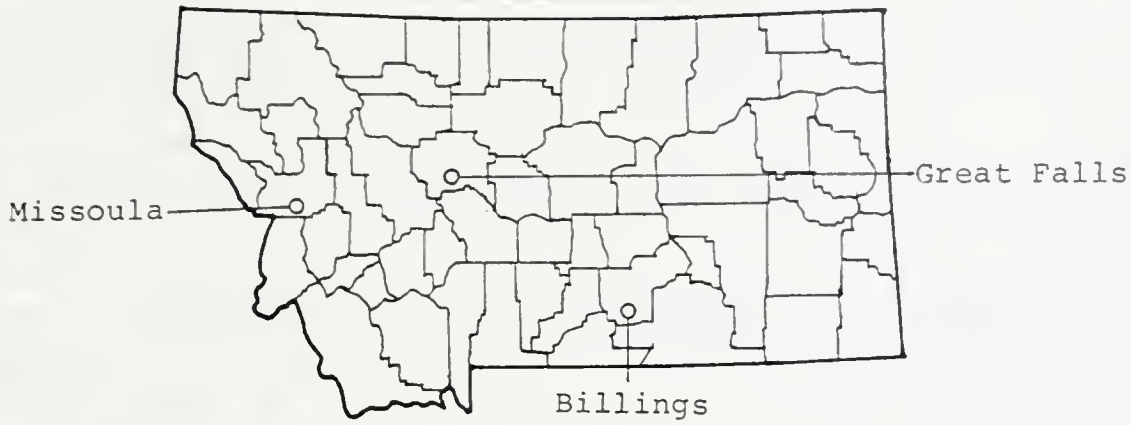
Designated Area	Does Not Meet Primary Standards	Does Not Meet Secondary Standards	Reasons
Colstrip Area	X		Street Dust and Strip Mining
Columbia Falls	X		Street Dust
Missoula	X		Street Dust, Smoke From Fireplaces and Industry
Missoula Area		X	Unpaved Rural Roads and Industry
Billings Area		X	Street Dust
Great Falls Area		X	Street Dust
Butte Area	X*		Street Dust and Mining Operation
East Helena		X	Street Dust and Industry

*EPA designation replaces state designation

LEAD

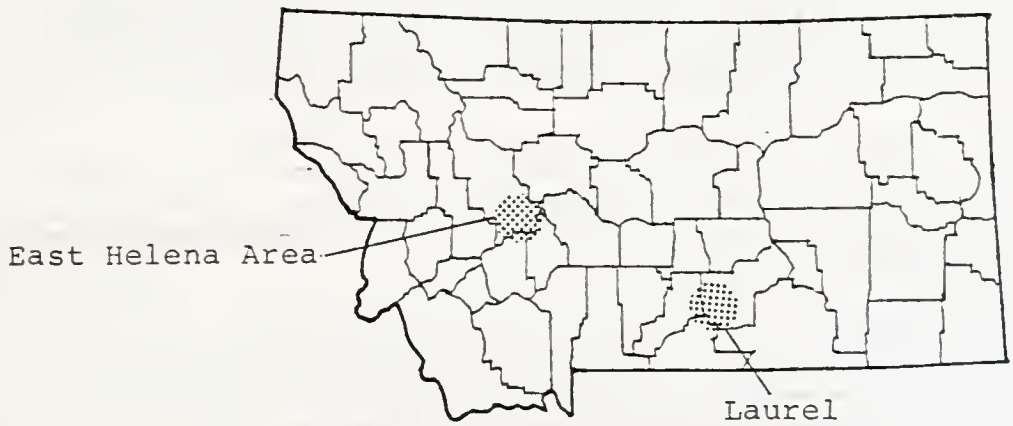
Designated Area	Does Not Meet Primary Standards	Reasons
East Helena Area	X	Smelter

CARBON MONOXIDE



Designated Area	Does Not Meet Primary Standards	Reasons
Billings	X	Exhaust From Motor Vehicles
Missoula	X	Exhaust From Motor Vehicles
Great Falls	X	Exhaust From Motor Vehicles

SULFUR DIOXIDE



Designated Area	Does Not Meet Primary Standards	Does Not Meet Secondary Standards	Reasons
Laurel Area	X		Refinery
East Helena Area	X		Smelter

Solid Waste And Hazardous Waste Management

The disposal of solid waste has become a major, complex problem in Montana. Due to its complex nature, it also relates to air, water and land pollution. In the future, the solid waste problem will become more expensive, expansive and complex. It is becoming clear that the concerted efforts of all levels of government, as well as in the private sector, must be employed to ensure proper waste management.

Our society consumes enormous quantities of material and energy which in turn generates an exceedingly large volume of waste. Currently, approximately 600,000 tons of municipal solid wastes are being generated every year in Montana, and given the well-established waste generation rates, by 1990 nearly 870,000 tons of waste will be generated per year. This waste is being disposed in more than 230 identified municipal disposal facilities and numerous undisclosed dump sites.

In addition, from state surveys it has been established that approximately 200,000 tons of potentially hazardous wastes are generated each year in Montana. This volume of hazardous waste includes pesticides, heavy metals and other industrial chemical wastes. Furthermore, a large number of "empty" pesticide and other toxic chemical containers of all sizes are discarded annually.

The state now possesses sufficient regulatory authority to control solid waste disposal. As required by the 1977 "Montana Solid Waste Management Act," the Solid Waste Management Bureau (SWMB) currently is licensing all solid waste management systems in the state. This licensing procedure assures that all such systems will provide a basic public service and not degrade the environment. To date, a total of 153 waste management systems have been licensed by the bureau.

In response to past state legislative action, the SWMB is providing both technical and financial assistance to local government entities for the development of waste management systems. This assistance includes a $350,000 grant program for the implementation of resource recovery and recycling systems.

Montana, through the SWMB, has received partial interim authorization to manage a state hazardous waste management program. In addition, the 1981 Montana State Legislature enacted significant hazardous waste legislation which will allow the state to adopt full authorization to oversee a state hazardous waste program. Preliminary data indicates that the following number of businesses are initially affected by the hazardous waste program:

Generators	141
Treatment, Storage and Disposal Facilities	110
Transporters	35

Currently, no licensed hazardous waste disposal facility is located in Montana. This situation does not pose an immediate problem

because of the availability of such sites in neighboring states. However, with the inauguration of a statewide hazardous waste program the difficult task of siting a hazardous waste disposal facility may have to be initiated in Montana.

Small quantity generators of hazardous waste currently are exempt from the hazardous waste regulations. This exemption is placing growing adverse impacts upon the state. It is anticipated that small quantity generators will continue to attempt to use municipal disposal facilities for disposal of their special wastes. This development will place continuing responsibilities and risks on the owners of these municipal facilities. The risks may be especially great from the standpoint of occupational and public safety considerations at such disposal sites.

In addition, there are a growing number of municipal disposal facilities in the state which are refusing to accept hazardous wastes in any quantity. This development is certain to result in the expanded dumping of wastes into such areas as open dumps with uncontrolled access and no supervision. This dumping will further increase the threat to public health and safety through unsuspecting contact with such wastes

Because of the action by the federal government to eliminate support for Subtitle D activities, the state currently is hard-pressed to adequately address the issue of small quantity hazardous wastes. However, because of the importance of the issue, the SWMB intends to assist, to the extent possible, not only small quantity generators, but also owners of municipal disposal facilities. This assistance will principally be in the form of assisting in the disposal of such wastes at acceptable facilities and, by doing so, assure the prevention of illicit hazardous waste disposal.

Pesticides

Montana is primarily an agricultural state and as such requires the use of pesticides to help manage a multitude of pest problems. Based on data collected from commercial applicators (1978), it is estimated that from 2.8-3 million acres are treated commercially each year. There are no accurate statistics available for private applicators, but generally the private applicators treat smaller acreages, do spot treating and field margin treating. In most years, private applicators would probably apply pesticides to 1.5-2 million acres.

The Environmental Management Division, DOA, has a responsibility to not only serve Montana agriculture, but is also mandated to protect the environment and the health of the state's citizens. To do this, the use of pesticides must be closely monitored. Toward this end, the Environmental Management Division administers a pesticide applicator certification program and an enforcement program. Both programs are now administered by the Enforcement Division of EPA to achieve consistency and continuity of purpose between the two programs. Since

their inception, the programs have significantly reduced the amount of pesticide contamination in Montana despite the fact that the number of certified commercial and private applicators has increased signficantly since 1976 (Figures 3 & 4).

Recertification of commercial applicators and dealers has been implemented. Credit is given to the applicators and dealers for each course they attended so they can accumulate 100 points during the four-year recertification period (Figure 5).

The basic elements of the pesticide programs include education, enforcement, monitoring and sampling.

Several fish kills in the state (1979) resulted in the promulgation of regulations restricting the use of aquatic herbicides through 1981. Inspections of aquatic applicators and enforcement of these regulations will be a priority item during this grant period.

In the area of education, efforts will be made to assist private applicators to do a better job in the area of safety, calibration and disposal. Appropriate enforcement actions will be taken on violations.

The recent recurrence of energy-related problems has resulted in an increase in practices such as no-till and chemical fallow management systems. Monitoring of soil and plant residues will be conducted as needed.

Efforts in the areas of monitoring and sampling are currently concentrated in establishing basic information concerning the consequences of spray drift on urban areas and several sensitive crops and establishing a network of control plots throughout the state.

Figure 3 Figure 4 Figure 5

Several test plots have been established in the state to provide baseline information on the effects of pesticides in the environment. Soil and air samples from each site will enable DOA personnel to determine concentrations of pesticides, and will give them something with which to compare future samples.

Special projects conducted in 1981 include: Monitoring of compound 1080 for Columbian ground squirrel control; the use of endrin and its residue levels in forage, water, soil, livestock and wildlife, and the study of herbicide drift on and near sunflower crops. These projects because of their significance to agriculture, wildlife and human health, will be continued in 1982.

Radioactivity

Elevated levels of radioactivity are currently being studied in two parts of Montana by state and federal agencies.

The DHES has been studying elevated radioactivity in water wells and geothermal springs in the Alhambra area since it was discovered in 1976. The latest studies by the DHES and U.S. Geological Survey (USGS) have been suspended while the state turns its attention to the recently discovered elevated levels of radiation in the Butte area.

The DHES has independently been investigating the radiation levels in Butte for more than three years. Although a variety of studies are still in progress, it appears that the elevated radiation levels are due to a combination of natural and displaced radioactive materials.

The DHES studies have been funded by the state, Department of Housing and Urban Development (HUD) and EPA. EPA has assisted in the effort by sending a radiation scanner van to Butte for several days, loaning the DHES indoor radon sampling units and flying over the area with radiation detection equipment.

In addition, the EPA has provided the DHES with the loan of both gamma and radon progeny detection and measuring equipment. Through its Las Vegas laboratories, the EPA has given extensive technical support in the forms of laboratory radioanalyses and supplying and reading dosimeters used to measure radon progeny concentrations.

Toxics

Asbestos

Since regulations that were expected to be published in January by EPA outlining a sampling and remedial action program for friable asbestos material in schools and public buildings have not been issued, efforts will continue under the EPA's voluntary program. School districts will be provided technical assistance in detecting any asbestos problems that may exist.

The Solid Waste Management Bureau will continue to provide disposal guidance for asbestos which complies with the State Solid Waste Management Act.

Polychlorinated Biphenyl (PCB)

PCB transformers and capacitors are still used in Montana. EPA plans to continue its efforts in the prevention of PCB incidences through a public information program and a rigorous investigatory program. Inspections will be provided for those facilities where an accident could endanger public health and the environment.

Fiscal Year 1981 Accomplishments

The following information reflects major state or EPA accomplishments during FY 1981:

Water

Wastewater Discharge Permit and Enforcement Program

- A backlog of approximately 30 expired permits was eliminated.
- Approximately 90 new permits were issued.
- Completed compliance sampling inspections as outlined in FY 81 SEA.
- Assumed delegation of program for permitting federal facilities.
- Approximately 130 complaints were received and processed.
- Eight Violation Report Forms were sent to the DHES Legal Division requesting assistance.
- Four Notices of Violation and Orders to Take Corrective Action were issued.
- Three civil complaints, including requests for assessment of civil penalty and corrective action, were filed.
- Three civil complaints were settled, resulting in corrective actions and collection of $5,750+ in civil penalties.
- Two complaints with a civil penalty are pending resolution.
- Approximately 80 preliminary enforcement letters were sent and included notices of violation of permit requirements and requests for corrective actions.

Water Quality Management Planning

1. Special projects funded by the 208 program were implemented by the following agencies:

   a. Montana Department of State Lands (DSL) Forestry Division - Watershed Improvement Project.

   b. DSL - Evaluation of Water Quality Impacts from Active Hard Rock Mining Operations.

   c. Hill County Conservation District - Beaver Creek Water Quality Improvement Project.

   d. Lewis and Clark County Conservation District - Stream Corridor Management Program.

   e. Green Mountain Conservation District - Development of a Water Quality Protection Ordinance.

   f. Jefferson Valley Conservation District - Stabilization Study of Pipestone Creek.

   g. Cascade County Conservation District - Muddy Creek Special Water Quality Project.

   h. Carbon County Conservation District - Bluewater Creek Water Quality Improvement Project.

2. Water Quality Appraisal Studies were completed for the following project task forces:

   a. Prickly Pear Creek Task Force.

   b. Muddy Creek Task Force.

3. Produced three newsletters.

4. Developed and distributed an information and education package for the conservation districts to arouse public involvement in local water quality management programs.

5. Reviewed 51 conservation district water quality management plans and approved 39.

6. Completed two films and two public service announcments - one on stream riparian management; the second on saline seep management.

7. Conducted a workshop for DSL staff on water monitoring methods.

8. Completed water availability studies for the upper Clark Fork River, upper and lower Missouri River and Musselshell Basin and major tributaries.

9. Completed a prioritization of instream flow reservation streams.

10. Completed a preliminary draft application for a flow reservation on the Clark Fork River.

Construction Grants

- Full staffing.

- Substantial delegation as of April 1, 1981.

- Total obligations of 21 million dollars.

- FY 1981 Priority List revised.

- EPA training conducted every month.

Drinking Water

Some of the past year's accomplishments in the drinking water program include:

1) A completely new method of record keeping.

2) Procedures for tracking compliance of community PWS's and assuring public notice is given and corrective action taken, and has been implemented. These systems are now being expanded to cover noncommunity PWS's.

3) Nearly all community PWS's which have chemical MCL violations have applied for variances.

4) Several PWS's have started improvements necessary to meet the MCL for turbidity.

5) A step-by-step enforcement procedure has been formulated and is now being used.

6) Coordination with the DHES legal division and the Montana Attorney General's Office has been greatly improved.

7) Regulations covering plan review have been revised.

8) A procedure for governing deviations to construction standards has been implemented.

9) Greater emphasis has been placed on operator training.

10) Spot-checks on new construction are being done by WQB engineers to assure adherence to approved plans and specifications.

11) A word processing system has been purchased for use by the WQB.

12) A radiological monitoring program has been initiated.

13) A water-use study is planned, the results of which will be used by engineers for design of new PWS's.

14) Coordination of DHES plan review efforts have been improved.

Air

Implementation plans have been developed for all areas and all pollutants except Great Falls (carbon monoxide), Butte (total suspended particulate), and East Helena (lead). These three plans are currently under development and will be submitted to EPA during the first six months of calendar 1982.

The AQB processed 105 construction permits to assure that new air pollution sources comply with all air quality rules and standards. The bureau performed 17,250 laboratory analyses on 4,150 samples to evaluate the effects and levels of air pollution. It analyzed 149,000 hourly field samples to investigate the air pollution levels throughout the state.

The AQB enforced compliance with air quality rules through 150 field surveillance actions.

Montana's ambient air monitoring network was reviewed.

Changes in permit and PSD rules were initiated.

Solid Waste

Hazardous Waste Management

EPA granted partial interim authorization to the state to manage a hazardous waste program on February 26, 1981. This program will now be upgraded until it can qualify for final authorization. Under interim authorization, the state will establish a manifest system; initiate transporter requirements, and provide temporary licensing of treatment, storage and disposal facilities. During the fiscal year, initial inspections of 25 treatment, storage and disposal facilities were made. In addition, the SWMB has established a working relationship with the industrial community which will be regulated under the hazardous waste regulations

Refinements in the state emergency response program were continued especially in the further development of internal response procedures and attempts to equip the emergency response team.

Specific disposal problems and sites were evaluated in 70 cases during the year involving industrial waste disposal.

Solid Waste Management

As of June 1, 1981, the bureau issued 153 licenses to solid waste management systems throughout the state. This licensing process was utilized extensively to gather baseline data for the open dump inventory.

In addition, the bureau has continued to issue state grants to local government entities to conduct detailed areawide waste management planning. During the fiscal year, the bureau has received legislative authorization to expand this grant program to provide implementation grants for recycling the resource recovery projects. For the next biennium, $350,000 in state funds are available for this grant program.

The planning grant program was of assistance in conducting the open dump inventory. As of June 1, 1981, completed inventories have been made on 21 disposal facilities for the fiscal year.

A state plan has been completed and adopted according to state law. During the fiscal year, certain modifications were made in that plan and it was submitted to EPA for final approval. As of June 1, no action had been taken on the plan.

Pesticides

The Montana DOA projects the following EPA funded program activities by the end-of-year FY 1981:

	End-of-year FY 1981
Dealer Inspections	100
Pesticide Applicator Inspections	140
Commercial Applicator Use Observations	220
Market Place Inspections	50
Pesticide Accident Investigations	60
Special Investigations	60
Efficacy Studies	12
Collection and Analysis of Samples:	
Formulation Analysis Performed	650
Residue Analysis Performed	1500
PCB and Pesticide Samples Received From EPA	450

An extensive cutworm outbreak in drought-stricken eastern Montana resulted in treatment of large blocks of land with the pesticide endrin. Several fish kills were documented and three major misuse cases resulted. A number of minor record keeping violations were also documented. Because of the persistence of the compound and because of the large acreage treated (125,000 acres) an environmental sampling program was initiated. Over 160 residue samples of soil, crops, water, fish, wildlife and domestic animals were collected. Analysis of a number of the samples were above tolerance which will require the department to collect additional samples in FY 1981 and into FY 1982.

Monitoring of dealers and applicators assisted DOA employees in locating areas treated as well as total endrin usage. An emergency rule restricting the sale and use of endrin and requiring that certain records be kept and sent to the department was promulgated in May 1981.

Thirty-five (35) man-weeks of time have been expended on this project to date.

Updated Quality Assurance Manual for Pesticide Analysis.

Trained personnel in the use of the GC/MS system for confirmation analytical work.

Developed new analytical techniques for analysis of various biological and environmental samples.

Certification Training and Examination	
Commercial Applicators (New)	200
Private Applicator (New)	300
Continuing Certification Training (Dealers and Applicators)	1184

Related Pesticide Activities

The Environmental Management Division of DOA provides pest management services to producers, industry, government agencies and the general public. These services include establishing integrated pest management programs for specific cropping systems, recommendations on use of pesticides, identification and surveillance of pests and the evaluation and resolution of the effects of pesticides on agriculture and the environment. The division also registers 3,551 pesticide products prior to their use in the state; licenses 824 pesticide dealers; licenses 1,468 applicators and their employees (300); licenses 8,620 private applicators, and regulates the sale of pesticides at the retail level. These services are provided by personnel located in Helena and in the five district field offices. The department's laboratory provides analytical regulatory and service analysis to other departmental programs and to the general public. Thus, a more comprehensive pesticide regulatory and service program is provided to Montanans by combining the state and federal pesticide

laws and pest management laws than would be provided by each program separately.

Radiation

A year's data regarding radon daughter concentrations was completed in approximately 150 Butte homes utilizing Radon Indoor Progeny Integrating Sampling Units (RIPISUs) supplied by the EPA.

Radon daughter concentrations in approximately 1,000 Butte homes and 100 Anaconda homes were estimated by use of the grab sample method.

The area of Butte primarily affected by elevated radon and radon daughter concentrations was identified and mapped.

The effectiveness of air cleaning devices was studied to determine their usefulness for reducing indoor radon daughter concentrations.

National Environmental Policy Act (NEPA)

In meeting EPA's review responsibility under NEPA, the following major EIS's and assessments were reviewed:

- 3 Wilderness Proposals
- Northern Tier Pipeline
- ASARCO Troy Mine
- Kootenai Falls
- BPA Transmission Lines
- Spring Creek Mine
- Numerous USFS P.U.'s
- Numerous BLM Projects
- Mountain Foothills Grazing
- Bob Marshall Seismic

In an effort to identify potential environmental issues and remove assessment deficiences related to construction grants, the Red Lodge, Helena, East Glacier, Bozeman, Hardin, Hamilton, Great Falls, Lincoln, Kalispell and other projects were reviewed. The Missoula project is being closely analyzed through a full EIS.

Toxics

EPA has developed an integrated toxics strategy. The state has assisted in determining which chemicals are to be considered in the strategy and which federal facilities in the state should be examined through this program.

The major toxic chemical used in Montana continues to be PCB's. During FY 1981 several minor PCB incidents involving some public exposure occurred. The clean-up of these releases was affected by the persons responsible. Through local and federal cooperation the clean-ups were performed in a safe and satisfactory manner.

More than 40 inspections of facilities using PCBs were performed in FY 1981.

Until EPA's regulations are finalized, guidance on asbestos identification will continue to be provided. Once the regulations are promulgated, compliance inspections will be performed.

Public Participation

Public participation for the FY 1982 MEA began in the fall of 1980 when the state and EPA asked interested persons to fill out a questionnaire indicating their concerns for future environmental programs. The responses were all in by January 1981, analyzed and priority programs identified for the 1982 MEA.

The review of the draft agreement will be sent to persons who have indicated an interest in environmental health programs and to state and federal agencies. The agreement will also be presented to the Board of Health and Environmental Sciences and appropriate citizen advisory groups for their review and comment.

PRIORITIES

1. Water

   Administration of the municipal construction grant for sewage treatment (205 (g)) program.

   Development of an instream flow strategy which addresses water quality concerns.

   Continued improvement of follow-up enforcement action.

   Timely issuance and reissuance of permits and initiation of necessary enforcement actions to insure compliance.

2. Air

   SIP Implementation and Development
   - PSD delegation
   - Missoula, Great Falls and Billings CO and TSP
   - Butte, TSP
   - East Helena, Lead

   Source Surveillance
   - PSD and new source review
   - Inspection of A-1 (Class A) sources
   - Emission inventory update

   Monitoring

- Implement National Air Monitoring Station (NAMS) and State and Local Air Monitoring Station (SLAMS) network

- Operate Quality Assurance Program

- Audit Continuous Emissions (CE) Monitors

- Audit Quality Assurance (QA) Programs For Company-Owned Monitors

3. Solid Waste Management

Implement and maintain a comprehensive state hazardous waste management program.

Closing or upgrading of existing open dumps by the implementation of the state Solid Waste Management Plan and application of appropriate state regulations.

4. Pesticides

Maintain the quality pesticide enforcement and laboratory programs established between the EPA and the Department of Agriculture.

Emphasize the resolution of special pesticide enforcement problems including the drift of pesticides,use and misuse of endrin and aquatic herbicides and the disposal of pesticides and their containers.

Establish a pesticide priority rating system for the established comprehensive pesticide enforcement program and establish a program to evaluate individual program activities and the total pesticide program.

5. Radiation

Butte Radiation

-Reduce radon levels in dwellings in Butte.

- Continue study to determine contributing factors to elevated radiation levels in Butte.

- Continue study utilizing passive track etch dosimeters to determine soil radon exhalation rates and to accomplish long term measurement of indoor radon concentrations.

RESOURCE SUMMARY FOR MONTANA-EPA PROGRAMS

The resource summary for all Montana-EPA programs (or media) is shown in the Resource Summary Table (Table 4). Following this table, each program is discussed. The highest priorities within each program are emphasized in the narrative discussion. Detailed work plans which

specifically address all program elements within a medium follow the narrative.

TABLE 4

RESOURCE SUMMARY TABLE

Program	Federal Grant $	State Resources $	State/ Local Work Years	Federal Work Years
Air				
State 105	550,000	383,989	30.50	4.00
Water Quality				
Water/Wastewater Op. Cert.	0	17,553	.5	00
State 106				
Program Management	38,462	20,693	3.5	.30
Gen & Point Source Plan	25,641	2,956	.5	.20
Operation & Maintenance	29,487	6,799	1.15	.23
Permits	121,795	24,831	4.2	.95
Enforcement	108,974	16,554	2.8	.85
Monitoring	25,641	15,667	2.65	.20
Section 208 Grants	235,166*	78,388*	7.45	.23
205 (g)	363,240**	0	11.15	2.55
Drinking Water				
State PWS Grants	315,700	105,633	10.4	.50
State UIC Grants	91,300	0	0	.50
Hazardous Waste	239,000	39,833	7.05	4.45
Pesticides				
State Enforcement Grants	421,714	123,154	18.37	1.20
State Cert. Tr. Grants	20,000	20,000	1.02	.05
Radiation	381,800	0	9.6	.30
Categorical Programs				
Toxic Substances	0	0	0	.30
Asbestos in Schools	0	0	0	.10
Indians	382,500	0	.02	1.10
Flathead Study	410,000	0	2.0	.20
Federal EIS Review	0	0	0	.50
Laboratory Support	90,109	0	0	0
Emergency Response	0	0	.33	.36
Quality Assurance	0	0	.05	.03

*FY 1981 Funds
**FY 1980 and 1981 Funds

PRIORITY ACCOMPLISHMENT STRATEGIES

Air

- Implement SIP
- PSD
- Air Quality Monitoring
- Transportation Control Plans
- Development of State Implementation Plan for Lead

Water

- Wastewater Discharge Permit and Enforcement Program
- Drinking Water
- Instream Flow Activities
- Construction Grants

Solid Waste

- Hazardous Waste Management
- Solid Waste Management
- Facility Planning and Implementation

Pesticides

- Enforcement
- Certification

Radiation

- Butte Radiation Program

PRIORITY ACCOMPLISHMENT STRATEGIES

Air

Implement SIP

All nonattainment plans except the Missoula carbon monoxide (CO) plan were either approved or conditionally approved in FY 1981. The Missoula plan was originally disapproved, but it has been resubmitted to EPA and will hopefully be approved in FY 1982. Therefore, the work done in 1981 will be important towards achieving attainment of the National Ambient Air Quality Standards by 1982. Major plan developments however are required for Great Falls (CO) and Butte (TSP). Goals outlined for 1981 must be met if attainment is to be achieved by 1982.

A part of SIP implementation is the state's compliance and enforcement program for stationary sources. Continued emphasis will be placed on major source inspections since the Clean Air Act no longer allows for continued noncompliance of major sources through variance procedures. Significant violations by major sources in most instances will have to be dealt with through court actions and, if appropriate, by the imposition of noncompliance penalties.

PSD

Because of the court decision involving the Alabama Power Company, Montana's PSD regulation had to be revised to meet EPA requirements. This revision is presently under way and the state expects that EPA will approve the new regulation and delegate the PSD program to the state in FY 1982. However, prior to delegation, EPA and Montana will enter into an interim agreement which essentially provides for Montana to perform the PSD analyses. Montana is currently developing a new set of PSD regulations in order to receive EPA delegation. These rules should be approved by the end of the second quarter of 1982.

As part of the permit requirements, industries will be required to conduct baseline monitoring and diffusion modeling relating to their proposed activities. The Air Quality Bureau will be required to review the proposed monitoring networks and modeling techniques as well as the results of those efforts. This could take considerable time since each permit will require much public involvement and could result in a considerable amount of technical and political controversy. To offset the costs of these activities, the bureau will probably request legislative approval for a permit fee system. If the request is turned down, additional EPA financial assistance may be necessary to insure the successful implementation of the PSD program.

Following promulgation of the visibility regulation by EPA in late 1980, the State is developing SIP approaches to satisfy visibility requirements in Class I areas and integral vistas.

Air Quality Monitoring

The accurate measurement of Montana's present and future air quality plays an important role in existing and future SIP revisions. The location and impacts of new sources and proper technical and impact analyses are essential for the continued protection of Montana's pristine air quality and to accommodate orderly industrial growth.

The state has completed a review of its air monitoring program and has prepared and submitted a Network Review Report to EPA. Modifications to the existing network will be carried out according to the schedules set forth in that report.

Transportation Control Plans

The Billings and Missoula carbon monoxide plans have been approved by the State Board of Health and have been submitted to EPA for approval.

There is a strong probability that Missoula may have an areawide carbon monoxide problem in the winter due to wood burning stoves and fireplaces. Some additional monitoring and modeling will be done during the 1981-82 heating season to test this hypothesis.

The Federal Highway Administration, the state's Department of Highways and local planning agencies must be involved if SIP strategies are to be completed in an expeditious manner. Because of the long time delays in implementing transportation changes, the process began in early 1980, with completion scheduled for 1982. Regular meetings among the involved groups will be held to insure communication and progress.

Great Falls has been designated nonattainment for CO and the local governmental agency has the responsibility to develop the control plan. A close working relationship between the Air Quality Bureau and the designated agency will be maintained to insure timely development and implementation of a plan. A schedule has been adopted for the development and submission of the plan.

Development of State Implementation Plan for Lead

Based on EPA requirements, a lead implementation plan will be developed for the East Helena area. A portion of the plan will be developed under contracts using EPA funds. Major contract activities will include development of an inventory for stack and fugitive emissions, followed by modeling of the emissions. Hi-volume sampling data indicate violations of the National Ambient Air Quality Air Standard for lead in East Helena.

Wastewater Discharge Permit and Enforcement Program

The priority of the Montana Pollutant Discharge Elimination System (MPDES) is to administer and enforce an effective wastewater discharge permit program. This is an ongoing program in which permit applications are reviewed and, if appropriate, permits are issued. Major dischargers which have the greatest potential environmental effect receive the highest priority in the program. The minor dischargers are reviewed, but not with as much detail as major dischargers. However, because of their large numbers, minor permits consume large amounts of time. This will be somewhat alleviated if certain of these categories can be handled by general permits. The DHES is developing appropriate regulations.

Self-monitoring reports are submitted by all dischargers for review by the WQB. Compliance monitoring of major dischargers is performed by the bureau at a frequency necessary to assure accurate results. The minor dischargers are compliance monitored when it is apparent that analyses may be in error or the discharger is out of compliance with its discharge limitations. Support is provided by the DHES Laboratory Division in the analyses of samples. Inspections of treatment facilities are also performed to assure adequate operation of facilities. Investigations are also made when complaints are received on permittees or where possible violations are occurring by persons not having a permit.

Compliance schedules are set forth for those dischargers not meeting limitations or if stream standards are violated. For municipalities the compliance schedules are coordinated with the WQB Construction Grants Section so the projects which are creating the biggest problems are given the highest priority for federal funds. Input from the SWMB will be provided to assure that residual wastes are properly handled.

Enforcement action is taken where appropriate. Enforcement may be a letter from the WQB, a compliance order issued by the department or a district court action to seek compliance and may include a monetary penalty. Support is received from the DHES Legal Division and the EPA on enforcement.

Specific Priorities:

- Issue, reissue or modify major permits ensuring that water quality standards are met; toxic criteria limitations and pretreatment requirements are imposed and residual wastes handled appropriately (input from SWMB to be provided), and appropriate effluent limitations and self-monitoring are provided.

- Issue, reissue or modify other permits.

- Pursue general permit issuance for such categories as bridge project cofferdams, small placer mining dredges, storm water, feed lots and sewage lagoons.

- Process 3 (a) authorizations and Water Quality Standard (401) certifications.

- Provide timely complaint response and followup.

- Provide compliance sampling monitoring twice yearly of all major industrial permittee discharges and once yearly for 10 major municipal dischargers, completing form EPA-3560-3 for each.

- Compliance monitor 10 minor dischargers where self-monitoring data is suspect - provide a quality assurance program to assure appropriate laboratory results.

- Provide appropriate enforcement and report to EPA, giving priority to major dischargers.

- Provide timely review and appropriate notification on self-monitoring information.

- Assist in training enforcement and compliance personnel (EPA).

The Clean Water Act requires states administering the permit program to adopt a pretreatment program which will control certain discharges to municipal systems. The WQB is attempting to develop a reasonable pretreatment program which can be feasibly implemented in Montana.

Safe Drinking Water Program Implementation

The inventory of public water supplies in Montana was considered to be completed by December 31, 1980, with the most recent total showing 609 community water systems and 1,147 noncommunity water systems. To date, nearly all the WQB's efforts have been expended to bring community PWS's into compliance and very little time has been devoted to the noncommunity supplies. At this point there are some community supplies which are still not in compliance and it is WQB's aim to correct as many as possible in the next fiscal year. At the same time the WQB will begin to shift its emphasis to the noncommunity supplies. The bureau has started a program to inform them of their responsibilities under the Safe Drinking Water Act and approximately 40 percent have been placed on a schedule for monitoring the bacteriological quality of their water. The WQB plans to have all supplies analyzed for nitrates next year and hopes to have most of them on a regular coliform sampling schedule.

Major objectives for the coming year will be:

- Improve compliance of community water supplies for all of the requirements of the Safe Drinking Water Act.

- Provide enforcement through the DHES Legal Division when community public water supplies are not in compliance with the regulations.

- Monitor and enforce the public notification requirements of the Safe Drinking Water Act.

- Improve the bacteriological quality of those supplies not meeting the MCL for coliform bacteria.

- Grant variances and establish compliance schedules for those systems which need physical improvements to meet MCL's.

- Update regulations as needed.

- Conduct field investigations for approximately 90 percent of all public water supplies.

- Provide technical assistance regarding the operation and maintenance of public water systems.

- Provide training and certification for operators.

- Review plans and specifications for new supplies and improvements to existing systems.

- Develop DHES policies to improve plan review and rewrite regulations as needed.

- Provide certification for chemical and bacteriological laboratories.

- Emphasize improving the compliance of noncommunity public water supplies.

Instream Flow Activities

In FY 1981 the DHES dewatering program has identified and ranked major stream systems throughout the state that experience dewatering or pollutant assimilation problems. Major water availability studies were completed at pertinent locations on the upper Clark Fork of the Columbia, Bitterroot, Gallatin, Madison, Jefferson and mid-Missouri river systems.

Applications for instream flow reservations for water quality purposes are being prepared for the Bitterroot and upper Clark Fork rivers. The applications include interrelated analyses of chemistry, sediment movement, stream geometrics and water quantity as a basis for the appropriations.

Priorities for FY 1982 include completion of the Bitterroot-upper Clark Fork applications, analyzing quality/quantity relationships on streams in the Upper Missouri system, collecting water quality and quantity data in deficient areas and conducting water availability studies for the Musselshell, Milk and lower Missouri systems.

Continued monitoring and defense of the Yellowstone instream reservation will also be a major task in FY 1982 as other reservation holders and water developers initiate water programs.

Construction Grants

The 205 (g) delegation agreement executed during FY 1981 provides for the state to perform 21 of the 22 major program functions. The state shall be responsible for the day-to-day management of construction grant activities. EPA will provide technical training on program functions and oversight of delegated activities.

Solid Waste

Hazardous Wastes

During the next fiscal year, a major priority will be the continued development of the state hazardous waste management program. This development will first require the state to receive complete authorization for Phase I Authorization from EPA. This will encompass complete authority over generators, transporters and the manifest system. Next, the SWMB will establish procedures required for Phase II C Authorization which includes permitting, monitoring and enforcement activities. The final major activity in developing a state hazardous waste regulatory program will be the preparation and submittal of the state's application to EPA for Interim Authorization Phase II C or final authorization.

In conjunction with the above stated activities, implementation will continue with the state hazardous waste regulatory program as provided for in Phase I Authorization. This implementation will include the continuation of notification procedures required of hazardous waste activities by the regulated community. In addition, inspections and preparation of enforcement actions will be maintained for hazardous waste generators, transporters and treatment, storage and disposal facilities.

The state will continue to maintain an emergency response system which includes a response plan and active emergency response team. This team is comprised of a cross section of state agencies representing a broad spectrum of disciplines. Such structure assures that state government can provide technical advice and direct assistance to a variety of emergency situations.

As the state's hazardous waste program develops, measures will be taken to assure that adequate work force resources are available. As needed, efforts will be made to secure adequate staffing for the

hazardous waste program. In addition, the ongoing training of current staff will be maintained. Such educational efforts will take advantage of training programs that are offered by the federal government and institutes of higher learning.

In all of the above-mentioned activities, a concerted effort will be made to provide public participation. Current state laws and regulations already provide formal mechanisms for public review and comment in the issuance of all permits. In addition, state law requires the DHES follow formal procedures to insure adequate review of any action that will directly impact citizens of the state. The level of public participation undertaken in other activities will depend on the degree of interest from affected or interested persons. Public participation will rely heavily on the mass media, direct mailings, public meetings and public hearings.

Solid Waste

Under licensing procedures required by state law, the SWMB will continue to maintain an inspection program of all waste management facilities. As warranted, the bureau will initiate enforcement action on those facilities which are identified as open dumps and for which no effort has been taken to close or upgrade.

The SWMB will continue to maintain a planning grant program to provide financial assistance to local government entities for purposes of conducting detailed solid waste management planning. Also, this grant program is being expanded to allow the bureau to provide implementation grants to local governments for resource recovery and recycling activities.

To the extent possible, the SWMB will continue to monitor and facilitate the proper disposal of small quantity hazardous wastes.

It still has not been determined to the satisfaction of the DHES that there is a true need for a centralized hazardous waste disposal facility in Montana. During FY 1982, an evaluation will continue to be made to ascertain the quantity and composition of hazardous wastes in Montana and their geographical distribution. If a true need exists, regional collection centers will be established where generators may dispose of wastes. Periodically, the material will be transported to approved hazardous waste disposal facilities out-of-state. Continual evaluation will be made of the volume and type of hazardous wastes deposited at the collection centers, and the continued availability of approved disposal facilities out-of-state. If, as a result of this evaluation, need can be demonstrated, action will be initiated to develop a centralized hazardous waste disposal facility(ies) within Montana.

Pesticides

Enforcement

The DOA's authority for registering pesticides, licensing and certifying applicators, licensing dealers and operators and for conducting inspections and carrying out enforcement actions is provided for in the Montana Pesticides Act, Section 80-8-101 through 306 MCA 1979.

The DOA proposes to continue the comprehensive cooperative enforcement program and agreement with EPA through inspections (including use/misuse, restricted and general use products, records and proper licensing), investigations, pesticide sampling, laboratory pesticide analysis, efficacy studies and enforcement actions. These activities would be continued under the quality assurance agreements made with EPA under previous grants. The DOA's pesticide specialists hold EPA credentials and have the authority to carry out the mandates of the Federal Insecticide, Fungicide and Rodenticide Act as well as the Montana Pesticides Act.

The DOA has been granted "primacy" under the policies and procedures established by EPA. It is the intent of the department to serve as the primary agency in conducting inspections, investigations and sample collection and analysis in accordance with EPA approved procedures and to take effective action against violators. The state will continue to issue and monitor Section 24 (c)'s, Section 18's and experimental use permits.

The promulgation of regulations restricting the use of aquatic herbicides will be finalized in 1982. Additional regulations to be implemented and monitored include the restriction of the use of endrin and establishment of the ultra low volume and low volume regulations.

The Montana Pesticide Act was amended in 1981, and will require the revision and adoption of new regulations. The amendments to the act will become effective October 1, 1981. Significant new powers were given to the department in the areas of pesticide investigation and drift control.

Continuing efforts will be made to determine if pesticide drift is, or may be, a contributing factor in causing environmental damage. It is recognized that different pesticide products, varying carrier rates and climatic conditions can, and will, affect drift patterns.

The DOA's pesticide analytical laboratory will continue to maintain (and improve) the quality assurance program for sample handling and analysis. The laboratory will continue to provide pesticide analytical services to EPA and other states on a fee basis which will cover the cost of supplies, materials and communications.

A new cooperative enforcement agreement between the DOA and EPA has been adopted for FY 1982.

Since the DOA's enforcement program is subject to yearly review and funding by EPA, no long range objectives can be projected. All objectives stated are for the 1982 federal fiscal year.

The specific activities and accomplishment commitments can be found in the Pesticides Media Work Plan.

Certification

The certification program is a federally mandated program which requires pesticide applicators using restricted-use pesticides to comply with state and federal certification standards. The Montana Certification Plan was approved by EPA and has been in effect since 1976.

The strategy will be to maintain the data processing system for the storage of qualification data for dealers and applicators and for the issuance of certification credentials to qualified applicators as well as to newly certified individuals entering the system.

Most of the commercial and government applicators requiring certification have been approved, but the strategy will be to conduct at least one general certification course (24 hours) for new applicators who wish to be certified. Indications are that approximately 80 percent of the private applicators desiring certification have been certified. The strategy will be to conduct training for private applicators in those counties where the need is expressed.

The strategy for recertification will be to provide recertification training for the following applicator categories: Agricultural Vertebrate Pest, Right-of-Way Pest, Food Manufacturing and Processing, Regulatory Weed, Regulatory Rodent, Regulatory Predator and Regulatory Rabid Skunk. Additionally, the private applicators in Agricultural District IV will receive recertification training specific to their needs (crops, cropping systems and pest complexes present).

Radiation

Butte Radiation Program

The purpose of the Butte Radiation Study is to: Determine the contributing factors to the elevated radiation levels in Butte; ascertain the geographical area(s) of the city most severely impacted; determine the levels of radiation to which Butte residents are exposed; define the health risks associated with these elevated radiation exposures,and insofar as possible, determine methods to reduce radon and radon progeny levels in the affected dwellings in Butte.

Under contract with EPA, the Occupational Health Bureau (OHB), DHES, has established an ambient radon and radon progeny monitoring station at Hebgen Park. Data accumulated at this station will be evaluated to determine diurnal and seasonal fluctuations in radon and radon progeny concentrations. In addition, data accumulated at this

station will provide information pertaining to the equilibrium in ambient air between radon progeny and the parent radon-222.

As a cooperative effort, the EPA's Las Vegas Laboratory and OHB will conduct preliminary evaluations of radon and radon progeny levels and sources in the city of Butte. These evaluations will be accomplished primarily through the review of existing data.

The OHB will place 250-300 track etch dosimeters in the Butte soil on a grid basis to determine radon soil-gas concentrations. The grid system to be utilized will be developed as a cooperative effort between OHB and EPA. The placement of these dosimeters will assist in identifying radiation problem areas in the city of Butte.

OHB will measure radon progeny concentrations in approximately 100 structures utilizing Radon Indoor Progeny Integrating Sampling Units to be provided by the EPA. Each structure will be measured for a period of one week, four times a year at three month intervals. Information gained by these measurements will provide a reasonable estimate of average annual radon progeny concentrations in structures sampled.

OHB will perform radon exhalation tests on various geological formations such as aplite, quartz monzonite, rhyolite, etc., to determine the contribution that these various geological formations are making to the elevated radon concentrations found in homes.

OHB will determine radon and radon daughter concentrations in homes using the grab sample method. This method of sampling will provide a rapid method of determining the geographical area of Butte most severely impacted by radiation exposure and will provide additional information concerning the equilibrium between radon and radon progeny in structures.

Environmental samples will be collected by the OHB for radioanalysis to be performed by the EPA Laboratory in Las Vegas. Samples will be collected as requested by the EPA project officer.

An additional contract has been negotiated between EPA and DHES under which EPA will supply track etch dosimeters and perform statistical analyses of data, OHB will place and collect the dosimeters from approximately 70 homes as well as compare the results of the track etch dosimeter measurements with direct reading radon monitors, direct reading working level monitors, passive environmental radon monitors and Radon Progeny Integrating Sampling Units. It is anticipated that this contract will result in cheaper, faster and better methods of measuring radon and radon progeny concentrations in structures.

MEDIA WORK PLANS

Air

Water

Solid/Hazardous Wastes

Pesticides

Radiation

Categorical Programs

AIR QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
			WORK YEARS		DOLLARS	
	THROUGH MIDYEAR	THROUGH END OF YEAR	STATE LOCAL	EPA		
I. Air Activities	(Date of Completion)		14.0	2.0	406,693	AQB
A. PSD Delegation						
1. Develop PSD rule.	11/81					AQB,EPA
2. State submit regulations to EPA.	2/82					AQB
3. EPA take action.		8/82				EPA
B. Point Source Compliance - State shall inspect each Class A-1 source and 1/2 of Class A-2 sources at least once per year. In addition to the State inspections, EPA-Montana Office shall perform 12 facility overview inspections of Class A sources.	40	100				AQB,EPA
C. Area Source Compliance - Inspect significant area sources at least once per year.		As Required				AQB
D. Enforcement - State shall take formal enforcement actions against significant A-1 and A-2 violators within 30 days following the violation. After 30 days appropriate enforcement action may be initiated by EPA.		Necessary Action				AQB
E. Emission Inventory Update - Update the emission inventory for Class A-1 and A-2 sources. Provide quarterly updates through Emission Inventory System (EIS) on compliance status.	40	100				AQB
F. Track ISP and CO implementation plans in nonattainment areas.	As Required					AQB

AIR QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
G. Butte TSP - State Implementation Plan					12,000*	AQB
1. Complete chemical mass balance lab analyses.	3/30/82					AQB
2. Chemical Mass Balance Report.		4/30/82				AQB
3. Submit SIP to EPA.		9/20/82				AQB
H. Intergovernmental Cooperation - Review and update the Section 174 agreements for transportation-related pollutants.	1 Program					AQB
I. Identify A-1 and A-2 source classification.		Update EIS				EPA
J. Missoula CO Study						
1. Reevaluate CO problems for impact of stoves and fireplaces - conduct study.	10/81 - 3/82				10,000*	EPA
2. Prepare report		6/82				
K. Lead SIP			.50	.20	45,000**	AQB,EPA
1. Evaluate fugitive emissions at ASARCO smelter and make emission estimates.	Completed Study 9/81	1 Report				AQB,EPA

*LOE Funds
**FY 1981 Funds

AIR QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
2. Develop and evaluate control strategies.	3/82					AQB,EPA
3. Complete SIP revision report.		5/82				AQB
4. Hold public hearing.		7/82				AQB
5. Submit SIP to EPA.		9/82				AQB
6. EPA take action.		3/83				EPA
L. Great Falls CO						
1. Complete emissions inventory.	1/82					GF
2. Complete additional monitoring.	2/82					GF
3. Model results and evaluate control strategies.		4/82				GF
4. Prepare, plan and hold a public meeting.		7/82				GF
5. Submit plan to State.		8/82				GF
6. Submit plan to EPA.		10/82				AQB

AIR QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
M. New Source Review			3.50	1.20	167,112	
1. Permits - Issue approximately 80 new source permits. Copies of permits will be sent to EPA.	40	80				AQB
2. New PSD Review - Review and issue approximately 15 PSD permits. Copies of permits will be sent to EPA.	10	15				AQB,EPA
3. Baseline Monitoring and Data - Review industry baseline monitoring systems and subsequent data for approximately 10 PSD sources.	5	10				AQB
4. Increment Modeling and Tracking - Review industry baseline monitoring systems and subsequent data for approximately 10 PSD areas.	5	10				AQB
5. Visibility Requirements - Propose a visibility SIP revision for Class I areas.						
a. Prepare Draft SIP.	1/82					AQB
b. Submit SIP to EPA.		4/82				AQB

AIR QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
N. Monitoring			12.3	.25	349,897	
1. Complete annual network review	1 Report					AQB
2. Complete annual review of quality assurance plan and standard operating procedures.		6/82				AQB
3. Quarterly reporting of NAMS data and agency precision and accuracy data.						AQB
4. Complete site, system, and performance audits of selected PSD monitoring programs.	As Required	Ongoing				AQB, EPA
5. Perform system audits of State air monitoring program.		9/30/82				EPA
6. Emission Monitoring Program - Audit continuous emission monitors at designated sources.		Ongoing				AQB
7. Company Data Retrieval/Storage - Implement the program to retrieve and store company-collected data.		Ongoing				AQB
8. Complete SO_2 monitoring network in Billings per stipulation in Laurel SO_2 SIP.		4/82				AQB

AIR QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
O. Training			.20		7,287	AQB
P. SIP Progress						
1. Prepare annual SIP progress report.		4/82				AQB
Q. Conduct annual performance evaluation.		5/82				EPA
TOTALS			30.50	4.00	933,989	
PRIOR YEAR TOTALS					67,000	

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
I. Water Pollution Control						
A. Administration						
1. Provide general program direction and supervision and development of staffing and budget needs.			.60			WQB
2. Coordinate Regulations revisions.			.19			WQB
3. Participate in annual program management review.			.01	.05		WQB,EPA
4. Administrative support.			2.00			WQB
5. General policy guidance and review of program outputs.				.10		EPA
B. Wastewater Discharge Permit Program						
1. Issue, reissue or modify major permits ensuring that water quality standards are met, toxic criteria limitations and pretreatment requirements are imposed, residual wastes are handled adequately and appropriate effluent limitations and self-monitoring are provided.	8	11	1.40	.30		WQB,EPA
2. Issue, reissue or modify minor permits as needed.	45	90	1.70	.10		WQB,EPA

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
3. Provide sampling or evaluation inspections on all major discharges.						
a. Inspections will be completed on 15 major industrial permittees at least twice using Form 3560-3. Of the 30 inspections 15 of them will be sampling inspections. Ten major municipal permittees will receive sampling inspections. Approximately 10 minor dischargers will receive sampling inspections.	20	50	.70			WQB
b. Provide audit and evaluation inspections. Fifteen facilities, including those on Indian reservations will receive evaluation inspections from EPA.	5	15		.10		EPA
4. Provide appropriate enforcement action.						
a. Violations which are continuing and causing damage to an existing beneficial use will be given prompt attention.						
b. Violations by major dischargers with discharges of toxic materials will be given high priority.						
c. Other violators will be handled as time allows.	As Needed	As Needed	.90	.55		WQB EPA-Mon & Denve
d. State will be informed of EPA enforcement activities.						
e. EPA will initiate necessary follow-up actions against those permittees where the state action is not adequate to meet the requirements of the Clean Water Act.	As Needed	As Needed		.10		EPA EPA-Mon & Denve

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
5. Provide review and appropriate notification on self-monitoring information as reports are received. EPA-Helena reviews Federal facilities self-monitoring.	Ongoing	Ongoing	.50	.10		WQB,EPA
6. EPA 309(a) Notice of Violations (NOVs)	As Appropriate			.10		EPA
a. EPA summary of outstanding 309(a) NOVs.	6	12		.10		EPA
b. State response on outstanding 309(a) NOVs.	6	12	.10			WQB
7. Quarterly Non-Compliance Reports.			.20			WQB
8. Reconnaissance inspections. Estimated number = 75.	30	75	.50			WQB,EPA
9. Assume delegation of pretreatment program.		4/1/82	.10	.05		WQB,EPA
10. Investigate complaints of illegal discharges and possible violations of water quality standards and provide follow-up.	Ongoing	Ongoing	.70	.10		WQB,EPA
11. Provide coordination between permits/ enforcement program and construction grant program (includes quarterly noncompliance report), i.e., continue MMS.	Ongoing	Ongoing	.10	.05		WQB,EPA
12. Review MPDES programs for possible inclusion in EPA's consolidated permits program.	As Required	As Required		.10		EPA

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
13. Follow-up on the most significant problems identified through the DMR QA program. The results of this program will be utilized as a tool in selecting inspection candidates.						
14. State program overview, policies, procedures and output reviews.		Ongoing		.10		EPA,WQB
C. Groundwater (excludes UIC)						
1. Develop groundwater regulations.	12/31/81		.50			WQB
2. Investigate complaints of groundwater pollution and provide recommendations. Provide enforcement when needed.			.20			WQB
3. Monitor groundwater problems and obtain groundwater samples for analyses.			.20			WQB
D. Dredge and Fill						
1. Issue 3(a) authorizations for short-term activities which exceed turbidity standards.						
a. 3(a) authorizations issued.	35	70	.30			WQB
2. Review and issue certifications to Section 404 permits.						
a. Certification issued.	15	30		.20		EPA-Den
b. Waive certifications where adequate review provided by other agencies.	25	50				

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPO SIBL AGENC
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
3. Coordinate program with Corps of Engineers, EPA, Department of Fish, Wildlife and Parks, and Conservation Districts.			.10			WQB
4. Inspect operations.						
a. Preconstruction investigations.	5	10	.10			WQB
b. During construction investigations.	5	10	.10			WQB
E. Water Quality Standards						
1. Identify toxic pollutant problems and need for waste load allocations. Develop toxic priorities for Water Quality Standards revisions.			.10	.05		WQB,EPA Montana & Denve
2. Adopt nondegradation rule.						
a. Development Workshops.	October		.25	.10		WQB,EPA
b. Submit to Board.	December		.05			WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPO SIBL AGENC
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
F. Operation and Maintenance						
1. Inspections.						
a. Discharging facilities.			.50			WQB
b. Nondischarging facilities.			.20			WQB
c. Special Assistance.			.20	.20		WQB,EPA
2. Operator Training.						
a. Annual school.		1	.05			
b. Special seminars.		6	.10			
3. Big Sky Clearwater.						
4. 104(g) (1): Implementing JTCC.			.10	.03		WQB,EPA
G. Fixed-Station Monitoring			.05			WQB USGS FWP
For Federal fiscal year 1982, the following 7 USGS NASQAN stations have been designated as the State's Ambient Monitoring Network:						
Missouri River at Toston Milk River at Nashua Yellowstone River near Livingston Yellowstone River at Billings Tongue River at Miles City Clark Fork River below Missoula Flathead River at Columbia Falls		Ongoing				WQB

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
H. Biological Monitoring and Intensive Surveys		9/82	1.90	.10		WQB,EPA
1. Incorporate updated monitoring strategy and plan into 305(b) Report.		4/82				
2. Conduct intensive surveys.						
a. In support of "special" NPS water quality projects.		4				
b. Bozeman WWTP NH_3 toxicity study.	10/81					
I. Water Quality Assessment - 305(b)			.10	.05		WQB,EPA MT & De
1. Submit data to STORET.	12/81					WQB
2. Prepare analysis for State.	1/82					EPA,Der
3. Prepare WQA Report.		4/82				WQB,EPA MT & De
TOTALS			14.80	2.73		
J. Clean Lakes						
1. Complete lake inventory grant.			.02	.02		WQB,EPA
2. Complete Georgetown Lake Phase I grant.			.02	.02		WQB,EPA
3. Complete Sacajawea Lagoon Phase II project.						

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
II. A. Safe Drinking Water - Public Water Supply Supervision				.50		
1. Administration						
a. Provide general program direction and supervision and development of staffing and budget needs.		9/30/82	.80		29,705	WQB
b. Regulation Revision (1) Revise drinking water regulations as necessary.		9/30/82	.05		1,856	WQB
c. Prepare and submit the quarterly reports in the format and containing the information required by EPA.	1/1/82	4/1/82 7/1/82 10/1/82	.10		3,713	WQB
d. Participate in the annual program management review including assisting in the data gathering effort and in the discussion of the report.	3/31/82		.05		1,856	WQB
e. Administer contracts with local health departments for inspections of public water systems.		24	.10		3,713	WQB
2. Surveillance and Technical Assistance	Ongoing					
a. Perform inspections of public water systems with written survey reports to the owners or operators. Follow up on deficiencies.			2.20		81,680	WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
(1) Contracted county sanitarians		800				WQB
(2) Contracted individual(s)		400				WQB
(3) WQB staff		400				
b. Provide technical assistance to owners or operators of public water system regarding the plannings, operation, maintenance and treatment of water systems.	Ongoing	200	.50		18,564	WQB
3. Plan Review						
a. Review plans for new supplies and system improvements.		200	2.10		77,967	WQB
b. Perform inspections during construction and after construction is completed.		20	.20		7,425	WQB
4. Training and Certification						
a. Provide training for water system operators.		350	.80		29,702	WQB
b. Provide certification for water supply and distribution operators.		75	.10		3,713	WQB
c. Provide training to employees of local health departments in order to allow them to meet the obligations of their contracts.		30	.20		7,425	WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
d. Provide training or ensure that training is provided to members of the drinking water staff on administrative and/or technical requirements of their jobs.		10	.20		7,425	WQB
5. Enforcement						
a. Review bacteriological monitoring results daily.		9/30/82	.30		11,138	WQB
(1) Notify systems with unsafe results to do check sampling as per the regulations and follow up on the notification to ensure that check sampling is done.						
(2) Notify systems that fail to monitor or that exceed the maximum contaminant level for a reporting period to give public notification. Follow up on that notice to ensure that the water system does give public notification.						
(3) Provide public notification for those systems that fail to give notice themselves.						
(4) Require correction of whatever is causing the continual bacteriological problem, including the use of continual disinfection.						

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
b. Review turbidity results monthly	Ongoing	57	.10		3,713	WQB
(1) Notify systems that fail to monitor or that exceed the turbidity MCL to give public notification. Follow up on that notice to ensure that system does give public notification.						
(2) Provide public notification for those systems that fail to give notice themselves.						
(3) Require correction for those systems continually exceeding the turbidity MCL by first processing the exemption request & by issuing a compliance schedule.						
c. Prepare a schedule whereby all community surface water supplies and groundwater supplies have a sample analyzed for inorganic chemicals as required by regulations.		230	.20		7,425	WQB
(1) Notify systems that exceed the inorganic chemical MCL's to give public notification. Follow up on that notice to ensure that the water system does give public notification.						
(2) Provide public notification for those systems that fail to give notice themselves.						

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
(3) Require correction for those systems that exceed the MCL's. The first step in this is the processing of exemption requests and the issuing of a compliance schedule. Priority for correction should be based on the health hazard involved and the population at risk.						
d. Complete the radiological monitoring of all community water systems as per plan.		9/30/82	.30		11,138	WQB
(1) Notify systems that exceed the radiological MCL's to give public notification. Follow up on that notice to ensure that the water system does give public notification.						
(2) Provide public notification for those systems that fail to give notice themselves.						
e. Provide judicial enforcement against those public water systems which continually fail to meet the requirements of the drinking water regulations.		10/30/82				WQB
6. Data Management						
a. Maintain an inventory of all public water systems.		1,700	.30		11,138	WQB

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
b. Maintain essential records needed for conduct of the public water system supervision program. These include individual records of laboratory results, summaries of bacteriological and turbidity reports and copies of correspondence to and with public water systems including reports of inspections and public notifications.			.70		25,989	WQB
c. Program computer system to print out summaries of laboratory analyses.	1/1/82		.10		3,713	WQB
d. Clerical support		9/30/82	1.00		37,127	WQB
7. Provide laboratory capability to perform analysis required regulations, or require analyses at State certified laboratories.		9/30/82			35,208	WQB
a. Bacteriological samples		5,000				Lab
b. Inorganic chemical samples		225				Lab
c. Pesticides		151				Lab
d. Organic chemical and trihalomethane samples		25				Lab
TOTALS			10.40	.50	421,333	

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
B. Safe Drinking Water - Underground Injection Control					91,300	
1. Complete inventory of Class I, II, and III wells and aquifer characterization. Complete list of exempt aquifers.	1/1/82			.10		EPA
2. Implement permitting activity.		9/30/82		.20		EPA
a. Process permit applications. b. Public hearings. c. Issue permits.						
3. Formulate program for scheduling mechanical integrity tests for Class II, geothermal or salt mining wells.		9/30/82		.10		EPA
4. Formulate schedule for inventory of Class V wells.		9/30/82		.10		EPA
TOTALS				.50	91,300	

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
			WORK YEARS		DOLLARS	
	THROUGH MIDYEAR	THROUGH END OF YEAR	STATE LOCAL	EPA		
	(Date of Completion)					
III. Water Quality Management Planning						
A. Agriculture NPS Control Program						
1. Coordination and implementation of Conservation District Water Quality Management Plans.		5 District Water Quality Projects	1.50			WQB, Local Districts
2. Continuation of DNRC program development assistance to local Conservation Districts.		59 Districts Provided Assistance	.25			DNRC, WQB
3. Ag-Education assistance to general public, Conservation Districts and other Ag entities.			1.00			WQB
4. Special projects and Ag-NPS pollution appraisals for Districts.		4 Appraisals	1.00			WQB
5. Coordination of Management Agreements with BLM and FS.		Ongoing Activity	.10	.03		WQB, EPA
6. Continuation or completion of carryover tasks: Farmland Drainage Assessment		Report Completion 6/82	.10			MBMG, WQB

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
B. Forestry NPS Control Program						
1. Continuation of DNRC Forestry Division Watershed Improvement Program.	12/31/81		.10			DNRC Forestry Division
2. Determine financial capabilities to refinance DNRC Forestry Program.	10/15/81		.10			WQB
3. Continue channel stability surveys in Mineral/Missoula Counties.	1/82		.20			WQB
4. Coordinate work agreement with USFS.		Ongoing	.10	.03		WQB,EPA
5. Assist in pilot demonstration project utilizing National FS/EPA education program.				.05		EPA
C. Mining NPS Control Program						
1. Continuation and completion of DSL contract (Evaluation of the Effects of Hard Rock Mining Activities on Surface Waters).		4/82	.15			DSL

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
D. Instream Flow Program			.50			
1. Continue reservation application on Upper and Middle Missouri River, including major tributaries.		9/30/82				WQB
2. Continue analysis of quantity/quality relationship in streams of reservation potential.		9/30/82				WQB
3. Oversee future water rights on Yellowstone River to ensure they are not interfering with Yellowstone Reservation.		9/30/82				WQB
E. Update State 208 plan including:	12/81		.05	.02		WQB,EPA
1. Review of NPS implementation progress. 2. Evaluation of management agencies. 3. Update of State WQM program strategy. 4. Revisions to CPP as needed.						
F. Implementation of Areawide WQM Plans						
1. Flathead Drainage WQM Plan	Refer to detailed work plans for milestones		2.0	.05	57,000*	FH208
2. Blue Ribbons WQM Plan			0.3	.05	13,500*	BR208
TOTALS:			7.45	.23		
- State					78,388*	
- Federal					235,166*	

*FY 1981 Funds

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
IV. Construction Grants						
A. Delegation of the Program - 205(g)						
1. Activities						
a. Pregrant Award						
(1) Priority list review & acceptance.*			.15	.05		EPA
(2) Preapplication Conference.	SD		.25			WQB
b. Step 1 Grant Application and Award						
(1) Plan of study.	SD		.20	.05		WQB
(2) Review of application and Clearinghouse comments.	SD		.10			WQB
(3) Review of proposed engineering contracts.	SD		.20			WQB
(4) Processing Step 1 Grant offers.**	S/E	S/E	.05	.05		WQB,EPA
(5) Minority Business Enterprise (MBE) Review.**	S/E	S/E	.01	.05		EPA,WQB
c. Step 1 Grant Activities						
(1) Overall management of projects.****	SD		.10	.05		WQB
(2) Mid-Course Facility Planning Meeting.	SD		.05			WQB
(3) Public Participation Programs.	SD		.10			WQB
(4) Payments.**	SD		.10			WQB,EPA
(5) Grant Amendments.**	S/E	S/E	.05	.05		WQB,EPA

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
d. Facility Plan Review						
(1) Review of Facility Plan.	SD		.30			WQB
(2) Infiltration/Inflow (I/I) Analysis.	SD		.15			WQB
(3) Sewer System Evaluation Survey.	SD		.10			WQB
(4) Review of Environmental Assessment and Preparation of Appraisal.*	S/E		.10	.20		WQB,EPA
(5) Public Hearings.*	SD		.20			WQB
(6) Finding of No Significant Impact.*				.30		EPA
e. Environmental Impact Statement (EIS) Preparation and Review	S/E		.05	.25		EPA,WQB
f. Step 2/4 Grant Application and Award						
(1) Administrative review of application.	SD		.25			WQB
(2) Review of proposed engineering contracts (including Value Engineering (VE) Proposal).	SD		.25			WQB,EPA
(3) Processing of Step 2/2+3 Grant Offers.**	S/E	S/E	.05	.05		WQB,EPA
(4) MBE Review.**	S/E	S/E	.01	.05		EPA,WQB
g. Step 2/4 Grant Activities						
(1) Overall management of project.****	SD		.20	.05		WQB
(2) Predesign Conference.	SD		.10			WQB
(3) In-Process Design.	SD		.10			WQB
(4) Payments.**	SD		.20	.05		WQB,EPA
(5) Grant Amendments.**	S/E	S/E	.05	.05		WQB,EPA

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
h. Plans and specifications review (and related technical review)						
(1) Technical (including operability and maintainability) and administrative review of P&S.	SD		.50			WQB
(2) Constructability & biddability.						COE
(3) Draft Plan of Operation Review.	SD		.05			WQB
(4) Review of User Charge (UC).	SD		.05	.05		WQB,EPA
(5) Review of Pretreatment Plan.	SD		.05	.05		WQB
(6) Review of Value Engineering (VE). N/A						
i. Step 3 Grant Application & Award						
(1) Administrative review of application.	SD		.25			WQB
(2) Review of proposed engineering contracts.	SD		.25	.05		WQB,EPA
(3) Processing of Step 3 Grant offers.**	S/E		.05	.05		WQB,EPA
j. Preconstruction Activities						
(1) Overall management of project preconstruction.	SD		.05	.05		WQB
(2) Preconstruction Conference.	SD		.05			WQB
(3) Bid Package Review.	SD		.05			WQB
(4) MBE Review.**	S/E	S/E	.03	.05		EPA,WQB
k. Step 3 Grant Activities						
(1) Overall management of projects.****	SD	SD	.05			WQB
(2) Processing change orders.	SD		.15			WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
(3) Payments.**	S/E	S/E	.60			WQB,EPA
(4) Grant Amendments.**	S/E	S/E	.05			WQB,EPA
(5) Interim inspections (including construction operability and maintainability).	SD	SD	.60			WQB
(6) Interim audit resolution.**	SD			.05		WQB
l. Step 3/4 Completion Requirements						
(1) Plan of Operation Review.	SD		.05			WQB
(2) Operation and maintenance (O&M) manual review.	SD		.25			WQB
(3) Sewer Use Ordinance Review.	SB	SD	.05	.05		WQB,EPA
(4) UC System Review.	SB	SD	.05	.05		WQB,EPA
(5) Review of Pretreatment Plan.	SD		.05			WQB
(6) Start-up Services.	SD		.50			WQB
(7) Final project inspection (including construction operability & maintainability).	SD	SD	.35	.05		WQB
(8) Final audit resolution.*	S/E	S/E		.05		EPA,WQB
(9) Project Close-out.*	S/E	S/E				EPA,WQB
(10) First Year 7500 O&M inspection and performance audit.	SD		.05	.05		WQB
m. Information control and support of Regional Construction Grants Management Information System (RCGMIS) including GICS	S/E	S/E	.15	.10		WQB,EPA
n. Inquiry response (FOI, Congressional, OMB, GAO, including Headquarters inquiries) **	S/E	S/E	.10	.10		WQB,EPA

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
o. Disputes, appeals, protests *	S/E	S/E	.05	.05		EPA,WQB
p. Construction grants program planning (including zero base budget (ZBB)) **			.05			EPA
q. Management Delegation	S/E		.10	.10		WQB
(1) Agreement management.*						EPA
(2) Negotiation of agreement and amendments.						EPA
(3) Special projects oversight.*						EPA
(4) Construction management assistance grant management.*						EPA
r. EPA Training Activities						
(1) Construction grants staff training and conference meetings.* -Ongoing-	S/E		.50	.10		EPA
Attendance to training sessions. -12-	6	6				
s. Clerical Activities*** -Ongoing-	SD		2.00	.05		WQB
t. Direct Construction Grants Supervisory Management*** -Ongoing-	SD		.50	.10		WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
u. Other Non-Project Related Activities						
(1) Advanced Secondary Treatment (AST)/ Advanced Waste Treatment (AWT) Review.** N/A						
(2) Needs survey coordination.	SD		.05	.05		EPA WQB
(3) On-site presence during survey.						
(4) Combined Sewer Overflow (CSO) Project Review. N/A						
TOTALS			11.15	2.55	363,240	

*These activities cannot be delegated to the State or Corps. EPA would retain primary role under any delegation plan, either because delegation is restricted by regulation or the activity is EPA-specific (such as "Management of Delegation"). Even though State or Corps resources related to this activity may be paid for under Section 205(g) no reduction of the EPA primary workload can occur.

**These activities are technically nondelegable, and the final responsibility will remain with EPA. However, the State or Corps may, under delegation, assume a strong staff role in support of EPA. In all cases, the EPA monitoring role for these activities will include the overall responsibility for proper execution of these activities.

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
***The activities noted (i.e., Clerical Activities and Direct Construction Grants Supervisory Management are not specifically delegated as separate functions in the formal delegation. Rather, they are gradually assumed as other functions are delegated, and will normally be included in either an overall manpower plan or as part of the workload of these other delegated activities. Therefore, no specific delegation schedule for clerical and supervisory functions is requested.						
****The "Overall Management of Projects" activity refers to the project scheduling and update, day-to-day monitoring of project schedule (including resolution of bottlenecks to completion), and other basic management responsibilities of a project manager not specifically listed elsewhere. The activity will generally not be specifically delegated as a separate function, but will occur at the point when sufficient delegation has taken place to allow EPA to shift out of project specific monitoring for the particular step.						
2. Staffing Update, if needed, of the Staffing Plan presented in the 205(g) Delegation Agreement.						

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
B. Construction Grants Accomplishments						
1. New Awards (1)						
a. Step 1		0				WQB,EPA
b. Step 2		0				WQB,EPA
c. Step 3		2				WQB,EPA
d. Step 2+3		2				WQB,EPA
2. Completions						
a. Step 1		15				WQB,EPA
b. Step 2		4				WQB,EPA
c. Step 3		15				WQB,EPA
d. Step 2+3		4				WQB,EPA
3. Obligations (1)(2)						
a. 1st Quarter (Oct-Dec)		$4.5x10^6$				WQB,EPA
b. 2nd Quarter (Jan-Mar)		$0.3x10^6$				WQB,EPA
c. 3rd Quarter (Apr-June)		$1.9x10^6$				WQB,EPA
d. 4th Quarter (July-Sept)		$0.3x10^6$				WQB,EPA

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
4. Outlays(3)						
a. October		$1.4x10^6$				WQB,EPA
b. November		$2.0x10^6$				WQB,EPA
c. December		$1.5x10^6$				WQB,EPA
d. January		$1.9x10^6$				WQB,EPA
e. February		$2.1x10^6$				WQB,EPA
f. March		$1.4x10^6$				WQB,EPA
g. April		$1.1x10^6$				WQB,EPA
h. May		$1.2x10^6$				WQB,EPA
i. June		$1.5x10^6$				WQB,EPA
j. July		$2.0x10^6$				WQB,EPA
k. August		$2.1x10^6$				WQB,EPA
l. September		$2.6x10^6$				WQB,EPA

(1)Assumes a $0 FY 1982 appropriation.

(2)Includes $0.3x10^6$/quarter for grant increases.

(3)These projections are the best estimation as per August 1981. Both EPA and MDHES have commitments through the 205(g) agreement that must be met to make this projection as reasonable as possible. However, due to conditions beyond the control of MDHES, the validity of the outlay projections is questionable.

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
V. Water and Wastewater Operator Certification						
A. Issue certification licenses to operators and give examinations to new operators.			.50			WQB/ Water & Wastewater Certification Board
1. Licenses issued		800				
2. Exams given		200				
TOTAL			.50		17,553	
VI. Laboratory Support						
A. Provide certification by performing evaluations of laboratories which propose to do analyses which will be submitted for compliance with State regulations. Labs certified include:	Ongoing					
1. Bacteriological laboratories		14				
2. Chemical laboratories		10				

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
			WORK YEARS			
	THROUGH MIDYEAR	THROUGH END OF YEAR	STATE LOCAL	EPA	DOLLARS	
	(Date of Completion)					
B. Provide laboratory facilities with the capability to do analyses as required by the State regulations. The type of sample which the State Laboratory will analyze are:						
1. Bacteriological samples.		5,500				
2. Inorganic chemical samples.		230				
3. Organic chemical samples.		10				
4. Nitrate only samples.		450				
TOTAL					90,109	

HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
I. Develop Authorized Hazardous Waste Regulatory Program	(Date of Completion)					
A. Submit to EPA a request for complete Phase I Interim Authorization to include the generator, transporter and manifest system authority.	10/1/81		.20	.05	7,910	SWMB,EPA
B. Public Notice of EPA intention to grant complete Phase I Activity.	11/1/81			.05		EPA
C. Develop and adopt any additional rules necessary to provide substantial equivalence with 40 CFR, Parts 260-265.	Ongoing		.65	.10	25,708	SWMB
D. Develop permitting, monitoring and enforcement procedures required for Phase II, C.	1/1/82		.60	.10	23,731	SWMB,EPA
E. 1. Develop State Quality Assurance Project plan for Hazardous Waste.		11/1/82				EPA
a. EPA provides guidance.		5/1/82		Regional Office		EPA
b. State submits plan for EPA review.		6/1/82	.07		2,769	SWMB
c. EPA reviews and comments on plan.		8/1/82		.05		EPA
2. State implements QA plan.		Ongoing	.10		3,955	SWMB
3. EPA QA Program Assessment.				.05		EPA
F. Prepare application for Interim Authorization Phase II, C and/or Full Authorization.						
1. Review draft application.		5/1/82		.10		SWMB,EPA
2. Public hearing.		6/1/82	1.1	.05	43,506	SWMB,EPA

HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
3. Submit final application.	(Date of Completion)	7/15/82		.20		EPA
4. Grant authority for Phase II, C to State.		8/1/82		.05		EPA
G. Quarterly report on State program status.	Jan., April July		.05	.05	1,978	SWMB,EPA
II. Implement Hazardous Waste Regulatory Program						
A. Notification of Hazardous Waste Activities						
1. Update notification data.	Ongoing		.10	.10	3,955	SWMB,EPA
2. Inspect potential non-notifiers.	6	10	.20	.15	7,910	SWMB,EPA
3. Prepare enforcement actions for non-notifiers and late notifiers (TSD's, generators and/or transporters).	As Needed	As Needed	.10	.05	3,955	SWMB,EPA
B. Hazardous Waste Generators						
1. Inspect generators for compliance with regulations, including manifest system.	30	60	.85	.50	33,618	SWMB,EPA
2. Prepare enforcement action where violation is determined.	As Needed	As Needed	.15	.10	5,933	SWMB
3. Follow-up inspection when determined necessary where enforcement action taken.	As Needed	As Needed	.13	.10	5,142	SWMB

HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
C. Hazardous Waste Transporters						
1. Implement EPA/DOT Memorandum of Agreement.	Ongoing			.10		EPA
2. Implement State regulatory plan with DOT and other State transportation agencies.		5/1/82	.25		9,888	SWMB
D. Hazardous Waste Facilities						
1. Request Part B permit applications.	As allowed by finalization of Federal Phase II Program		.05	.05	1,978	SWMB
2. Prepare and issue hazardous waste facility permits.	11		1.00	.80	39,551	SWMB,EPA
3. Inspect facilities for compliance with interim status standards and permit requirements.	12	25	.70	.40	27,686	
4. Prepare enforcement actions in cases of documented noncompliance.	As Needed	As Needed	.15	.10	5,933	
5. Conduct follow-up inspections as required.	As Needed	As Needed	.15	.10	5,933	
E. Participate in Montana/EPA permitting inspection and enforcement oversite.	Ongoing					
F. Report on program progress.	12/81	6/82	.05	.05	1,978	

HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
III. *Develop and implement requirements of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (Superfund)						
A. Provide effective response to environmental emergencies.						
1. Continue to develop existing programs for emergency response.	Ongoing		.15	.10	5,933	SWMB,EPA WQB
2. Provide on-scene response to environmentally significant spills of hazardous substances.			.05	.20	1,978	SWMB,EPA WQB
3. Provide technical assistance where requested.			.05	.30	1,978	SWMB,EPA WQB
B. Provide emergency assistance and remedial action at critical uncontrolled hazardous waste sites.						
1. Prepare site inventories and methods of prioritization for remedial action.	As required		.05	.30	1,972	SWMB,EPA
2. Develop cooperative arrangements between State of Montana and EPA for specific remedial activities.			.10	.10	3,955	SWMB,EPA
TOTALS			7.05	4.45	278,833	

*Supplemental Emergency Response efforts described in Categorical Work Plan

SOLID WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
I. Inspection and Enforcement	Ongoing					
A. Continued maintenance of a waste management inspection program.						
B. Prepare and initiate enforcement action where violation of licensure has occurred.						
C. Follow-up inspections where enforcement action has taken place.						
II. Planning and Implementation Grant Program	Ongoing					
A. Issuance of financial assistance to local governments for purposes of conducting waste management planning.						
B. Provide implementation grants to local governments for resource recovery and recycling activities.						
III. Small Quantity Hazardous Waste	Ongoing					
A. Expand communications with small quantity hazardous waste generators to assist in proper disposal of such waste.						
B. Provide direct technical assistance to owners/operators of licensed waste management facilities in the proper handling and disposal of small quantity hazardous wastes.						

SOLID WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
C. Continue the monitoring of small quantity hazardous waste handling and disposal.						
IV. Facility Planning and Implementation	Ongoing					
A. Continue to evaluate the need for regional hazardous waste collection centers.						

PESTICIDE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
I. Maintain and improve the established quality of the pesticide enforcement and laboratory program						
A. Field Activities						
1. Use/Misuse Inspections	50	230	2.60		98,500	DOA
a. Conduct misuse investigation.						
b. Conduct use observations primarily of commercial, agriculture, and non-agriculture use.						
c. When a violation is suspected - collection of formulation and residue samples.		335				
d. Special Enforcement Problems (efficacy, bioassay, laboratory analysis of biological samples).		12				DOA
2. Experimental Use Permits	0	10	.10		2,625	DOA
a. Monitor EPA - E.U.P.'s.						
b. Monitor State - E.U.P.'s.*						
c. Samples collected when violation suspected.	0	10				DOA

*If Section 5(f) is approved.

PESTICIDE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
			WORK YEARS		DOLLARS	
	THROUGH MIDYEAR	THROUGH END OF YEAR	STATE LOCAL	EPA		
	(Date of Completion)					
3. Producer Establishment Inspection			.25		5,873	DOA
a. Inspect each producer establishment once every two years.	27	27				DOA
b. Sample each restricted use pesticide once every two years and each general use once every five years.	40	40				DOA
c. Determine if proper records are being maintained.	27	27				
4. Marketplace Inspection	0	250	.70		16,244	DOA
a. General use pesticides-violative labeling.						
b. Restricted use pesticides-violative labeling.						
c. Nonregistered pesticides.						
d. Pesticides subject to decomposition - sample if over one year old.						
e. Surveillance for suspended-cancelled products.						
f. Surveillance for products produced in nonregistered establishments.						
g. Samples collected.	0	130				DOA

PESTICIDE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
			WORK YEARS		DOLLARS	
	THROUGH MIDYEAR	THROUGH END OF YEAR	STATE LOCAL	EPA		
	(Date of Completion)					
5. Monitoring State Plan						
a. Determine if dealers are selling restricted use pesticides in violation of 12(a)(2)(F). Inspect records.	540	560	3.05		72,800	DOA
b. Check applicators to see if licensed and are maintaining proper records. Inspect use of restricted use pesticides to determine if they are being used in accordance with label instructions.	677	717	2.79		65,234	DOA
c. Samples collected.		170				DOA
6. Other	5	40	.28		8,400	DOA
a. Imports, exports, recalls, cancellations, suspensions.						
b. Embargo.						
c. 24(c) registrations and Section 18 exemptions.						
d. Samples collected.		100				DOA
7. Samples Collected		785	2.60		54,165	DOA
B. Laboratory Operations and Programs						
1. Sample Analysis						
a. Formulation.	400	600	1.50		32,400	DOA
b. Residue.	26	1,261	3.50		117,401	DOA
c. Other (EPA samples).		300	1.00		22,428	EPA,DOA

PESTICIDE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
C. EPA overview of grant activities.				1.20		EPA
TOTALS			18.37	1.20	496,070	
INDIRECT CHARGES					48,798	
GRAND TOTAL					544,868	
II. Maintain the established pesticide applicator certification and training programs						
A. Certification Program			1.02			DOA
1. Data processing					32,000	DOA
2. Credentials (dealers & applicators)	4,425	5,500				DOA
B. Training					8,000	DOA
1. Certification (new)	200	300				DOA
2. Recertification	3,100	3,500				DOA
C. EPA overview of and participation in grant activities.				.05		EPA
TOTALS			1.02	.05	40,000	

BUTTE RADIATION PROGRAM MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	MAN YEARS STATE LOCAL	MAN YEARS EPA	DOLLARS	
	(Date of Completion)					
I. Implement study to determine contributing factors to elevated radiation levels in Butte						OHB
A. Establish and operate station for measuring ambient radon daughter concentrations in the City of Butte.		Ongoing	.30		9,439	OHB
B. Measure radon progeny in approximately 100 structures using RIPISU's.		Ongoing	.50		15,732	OHB
C. Conduct preliminary evaluation of radon and radon progeny levels and sources in the City of Butte.			.30		9,439	OHB, EPA L.V
D. Place 250-300 track etch dosimeters in the Butte area to determine radon soil gas concentrations.	Ongoing		.60		18,878	OHB
E. Perform radon exhalation tests on construction materials and various geological formations.		Ongoing	.30		9,439	OHB
F. Collect environmental samples for laboratory radioanalysis.		As needed	.10		3,145	OHB
G. Determine radon and radon progeny concentrations in structures utilizing the grab sample method.		Ongoing	.50		15,732	OHB

BUTTE RADIATION PROGRAM MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
			WORK YEARS		DOLLARS	
	THROUGH MIDYEAR	THROUGH END OF YEAR	STATE LOCAL	EPA		
	(Date of Completion)					
II. Provide guidance to State for its radiation testing program with Region VIII Housing and Urban Development Office and complete report development for Butte/Anaconda Aerial Radiometric Survey		Ongoing		.30		EPA
III. Implement study to test different methods for measuring radon and radon progeny. This study will include both passive and active measuring devices.		Ongoing	7.0	___	299,996	OHB,EPA
TOTALS			9.6	.30	381,800	

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
I. Toxic Substances	(Date of Completion)					
A. Share information on incidents of chemical contamination.						
1. Provide technical information in support of activities involving chemical contamination. Provide assistance in characterizing specific local problems & respond within 30 days.						EPA
2. Notify EPA of chemical contamination incidences.						DHES, DOA
B. Implement PCB work plan in Montana.						EPA
1. Inspect facilities which store or use PCB containing material.	30	75				
2. Prepare any technical documentation in support of enforcement actions on violations found during inspections within 30 days.						EPA
3. Update inventory of all sources subject to the PCB provisions of TSCA.	11/1/81					EPA
C. Strengthen and assist State in developing an integrated toxics program.						
1. Establish guidance committee for developing State's strategy.	3/31/82					DHES, DOA
2. Develop strategy.		9/30/82				DHES, DOA

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
D. Implement public awareness of PCB program.						
1. Ensure newsletters, speeches, etc., are given adequate coverage by the local press.						EPA
2. If needed, put on workshops.						EPA
TOTAL				.30		

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
II. Asbestos in Schools Program						
A. Provide and interpret EPA regulations on friable asbestos-containing materials in schools.						
1. Technical assistance	Ongoing			.03		EPA
2. Group presentations	2			.03		EPA
B. Coordinate asbestos disposal activities within 30 days of notification.	4			.02		EPA SWMB
C. Assist in asbestos analysis by providing a listing of laboratories with analytical capabilities.	Ongoing			.02		EPA
TOTAL				.10		

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
III. Indian Activities						
A. Air Programs						
1. Assist tribes with ongoing programs.				.25	250,000	EPA
a. Northern Cheyenne						
b. Fort Peck						
c. Flathead						
d. Fort Belknap						
B. Solid Waste						
1. Provide technical assistance to tribes.	2	4		.20		EPA
C. Pesticides						
1. Assist tribes in developing pesticide certification and enforcement programs.				.15	30,000	EPA
a. Fort Peck						
b. Fort Belknap						

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
D. Implementation or completion of Indian 208 plans.						
1. Blackfeet	Implementation by 1/1/82			.10	*15,000	EPA USFWS Blackfe
2. Northern Cheyenne	Completion by 3/1/82			.10	*22,500	EPA USFWS N.Chey.
3. Crow	Completion by 9/30/82			.10	*30,220	EPA USFWS Crow
4. Fort Belknap	Completion by 3/1/82			.10	*17,500	Ft.Belk.
5. Fort Peck	Completion by 3/1/82			.10	*17,280	EPA Ft.Peck
6. Coordination of State and Tribal WQM activities.			.02			WQB
TOTALS			.02	1.10	382,500	

*FY 81 Funds

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
IV. Flathead Study						
A. Assure that the Flathead Study is conducted in a timely and efficient manner in conformance with Congressional and EPA intent, and in pursuit of adopted Steering Committee goals.						
1. Serve as EPA representative on Flathead Study Steering Committee.	1 meeting per month			.10		EPA
2. Serve as EPA liaison with Study Area Manager.				.05		EPA
3. Serve as Project Officer (Co-Officer on all major research grants).				.05		EPA
4. Award FY 1982 Grant.					410,000	EPA
5. Flathead fishery study.	1982					FWP
6. Flathead limnology study.	1982					
7. Air quality monitoring and modeling.	1982					AQB
8. Administration/coordination of study.	1982					UofM DNRC
TOTALS				.20	410,000	

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
V. Federal Agency EIS Review						
A. Impact Federal agencies (BLM, FS, BPA, USGS, OSM) to gain environmentally acceptable energy development, grazing and timber projects.						
B. Impact various Federal agencies to gain environmentally acceptable projects.						
1. Pre-EIS consultation/EIS review of Forest Service Management Plans.				.20		EPA
2. Pre-EIS consultation/EIS review of BLM grazing plans, energy area land use plans, and other land use plans.				.10		EPA
3. Pre-EIS consultation/EIS review of highway plans, airport plans, etc.				.10		EPA
4. Pre-EIS consultation/EIS review of water development projects.				.10		EPA
TOTAL				.50		

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
	(Date of Completion)					
VI. Quality Assurance Programs						
A. All Media						
1. Review State QA documentation annually.						EPA
2. Provide QA guidance.						EPA
3. Provide audit and reference samples (as required).						EPA
4. Provide technical assistance (as requested).						EPA
5. Overview State's quality assurance activities and provide assistance as necessary.						EPA

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
			WORK YEARS		DOLLARS	
	THROUGH MIDYEAR	THROUGH END OF YEAR	STATE LOCAL	EPA		
VII. Emergency Response	(Date of Completion)					
A. Immediate removal action in response to releases or substantial threats of releases of hazardous substances.				.10		
1. Provide Federal on-scene coordinator (OSC) to monitor responsible party action for all severe releases requiring immediate removal.						EPA
2. Provide funding (if available) and OSC for immediate removal of releases when responsible party fails to provide proper response.						EPA
3. Carry out all State responsibilities under the State Environmental Emergency Response Plan and provide State OSC to monitor responsible party action for releases where Federal OSC not required			.10			State
B. Response to oil spills entering or threatening surface waters.				.10		
1. Provide funding (if available) and direct cleanup of all spills when responsible party fails to properly respond.						EPA
2. Provide OSC for all major and selected medium spills to monitor response by responsible party.						EPA

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORK YEARS STATE LOCAL	WORK YEARS EPA	DOLLARS	
3. Provide OSC for selected medium and all minor (when necessary) spills and carry out responsibilities under State Contingency Plans.	(Date of Completion)		.10			State
C. Contingency Planning						
1. Update Region VIII Oil and Hazardous Substances Pollution Contingency Plan.				.10		EPA
2. Update State Environmental Emergency Response Plan.			.10			State
D. Training of State and Local Emergency Response Personnel						
1. Ensure adequate safety training provided to State personnel responsible responding to hazardous material emergencies.	As Resources Permit					WQB
2. Participate in training activities and exercises to ensure that all parties having responsibilities under the Environmental Emergency Contingency Plan are aware of their roles and responsibilities.	3	3	.03			WQB
3. Assist State in performing outputs No. 1 and 2 above upon request by the State.	1	2	___	.06		EPA
TOTALS			.33	.36		